

71995-32

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

APR -7 2004

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Rhonda M. Mannion
Monsanto Company
600 13th street, N. W., Suite 660
Washington, DC 20005

Dear Ms. Mannion:

Subject: Roundup Weed & Grass Killer Ready-To-Use (Revised Label, Submission of Acute Toxicology and Product Chemistry)
EPA Registration No. 71995-32
Application Dated August 28, 2003

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable, provided you make the following changes before you release the product for shipment.

1. Retain the current precautionary labeling and First Aid statements concerning eye irritation.
2. On page 7, Revise "Storage" to read "Pesticide Storage".
3. On page 7, under Disposal for all packaging types except for Pull 'N Spray, delete the phrase "except to refill with other Roundup products".

Submit two (2) copies of your final printed labeling before you release the product for shipment. Amended labeling will supercede all previously accepted ones. A stamped copy of labeling is enclosed for your records.

The product chemistry data submitted are acceptable and satisfies the guideline requirements except for submission of the ongoing one year storage stability and corrosion characteristics studies. Submission of this information remains a condition of registration.

The acute toxicology data submitted are acceptable and satisfies the guideline requirements. Available data place this product in category III for eye irritation, and category for all other routes of exposure. This product is not a dermal sensitizer.

Copies of reviews are enclosed for your records.

Sincerely,

James A. Tompkins
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505C)

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Roundup Weed & Grass Killer Ready-To-Use

EPA Reg. No. 71995-32

[Editorial Notes: Bracketed text [] is for internal use and 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.]

[Refer to APPENDIX 3 for packaging related instructions.]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR -7 2004**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
71995-32**

Roundup Weed & Grass Killer Ready-To-Use

*Alternate Brand Name : Roundup Ready-To-Use Poison Ivy & Tough Brush Killer2
MON 78998 Herbicide*

Active Ingredient
Glyphosate, isopropylamine salt 2.0%
Other Ingredients 98.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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

NET ____


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Roundup Weed & Grass Killer Ready-To-Use

EPA Reg. No. 71995-32

Open Resealable Label for directions & Precautions
Press to Reseal

[Optional text] CONTROLS ALL WEEDS AND(&) GRASSES INCLUDING:
Barnyardgrass, Bermudagrass, Thistle, Chickweed, Common Ragweed, Dandelion,
Fescues, Johnsongrass, Clover, Yellow Nutgrass and(&) other grasses, weeds, sedges
and(&) brush.

Product Facts	
Container treats more than ____ weeds [24 oz treats 200 weeds]	
Treats up to ____ sq ft (approx. size of ____ tennis courts) [When calculating coverage, one gallon treats 300 sq ft and a tennis court is 2,106 sq ft]	
KILLS WEEDS	[Illustration grassy, broadleaf and woody weeds] ALL TYPES OF WEEDS & GRASSES (OR) ALL TYPES OF TOUGH WEEDS & GRASSES including: <ul style="list-style-type: none"> • woody brush & vines: • poison oak • poison ivy • wild blackberries • kudzu • bamboo • ragweed • Plus over 100 Unwanted Plants, Weeds & Grasses
WHERE TO USE	<ul style="list-style-type: none"> • On patios, walkways, driveways, gravel, or mulch beds • In flower(beds) and(&) vegetable gardens • Around flowers, shrubs and trees • Along fences and foundations • In recreational areas, parks and sports facilities • Around homes, buildings, cabins, lodges, and camp sites • On wooded or (and) vacant lots • Fields and trails • Other areas in your yard (Plus other areas where (tough) weeds are invading your yard)
	Questions, Comments or Medical Information call [insert contact #] www.roundup.com

DIRECTIONS FOR USE

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

HOW TO APPLY

- *[For Pull 'N Spray, Pull 'N Spray II, Battery Operated Sprayer, and EZ Sprayer Devices]* Follow illustrations and instructions above (on the side of the bottle) (on the *[Insert location of instructions/illustrations]*) to prime (ready) the sprayer.
- *[Non-foaming Sprayers]* Adjust nozzle to (a) coarse spray.
- *[Foaming Sprayers]* Turn (rotate) (twist) nozzle to (the) desired spray setting (position) (FOAM or SPRAY).
- Spray the weeds or grasses you want to kill until thoroughly wet (or covered with foam).
- When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water (or cut off treated area).

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.

IMPORTANT SPRAYER INFORMATION *[Optional - Battery Operated Device Only]*

- Read and follow all directions before use.
- *[Insert sprayer brand name]* is to be used only (was developed for use) with *[Insert brand name of refill pack or bottle]* bottles. *[Insert sprayer brand name]* may not be compatible with other products (products other than *[insert brand name(s)]*) (do NOT use any other products in the sprayer)
- Do not drop or throw sprayer.
- *[Optional text]* Do not submerge (immerse) sprayer in water. Never place sprayer in dishwasher.
- *[Optional text]* Never operate the sprayer when bottle is empty.
- Do not use soap or other cleaning agents to clean sprayer. If necessary, clean outer sprayer surface only with damp towel.
- *[Optional text]* Disconnect sprayer from bottle before installing or replacing the batteries.
- *[Optional text]* Do not operate sprayer while upside down.
- *[Optional text]* Do not spray overhead. Always point sprayer downward, from waist level and below.
- *[Optional text]* Never place your mouth on the nozzle or attempt to prime the sprayer by sucking through the nozzle.

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- [Optional text] Never spray towards your face or in the direction of another person.
- [Optional text] Insert batteries in their correct (+/-) position. Remove batteries for winter storage or when storing product for long periods of time.
- [Optional text] Always use a complete set of new batteries. Never mix alkaline, carbon-zinc, or rechargeable batteries.
- [Optional text] Always follow the manufacturer's recommendations for battery disposal and use.
- [Optional text] Purge [Insert sprayer brand name] of liquid for winter storage or place [Insert sprayer brand name] in a heated storage area for winter storage.

WHEN TO APPLY

- Apply when weeds are actively growing. (Use anytime weeds (and) (grasses) are actively growing.)
- For best results apply during warm, sunny weather (above 60° F) (to accelerate systemic movement from foliage to roots).
- Spray (Apply) when air is calm to prevent drift to desirable plants.
- (RAINPROOF) 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.

[Alternate text] [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)

- [Optional text] Apply when weeds are small and before seeds form.
- [Optional text] Established (hard to kill) weeds may require a repeat application.
- [Optional text] Note: Brush (sprayed in the Fall) may not be controlled until the following season. In the Spring, spray regrowth if it occurs.
- [Optional text] Weeds usually yellow and wilt within 2-4 days (hours) with complete kill in 1 to 2 weeks for annual weeds. Perennial weeds such as poison ivy may take 4 or more weeks for complete kill.
- [Optional text] Established (Perennial) weeds may require a repeat application.
- All ornamental flowers, trees and shrubs may be planted **1 day after** application.

ADDITIONAL TIPS [Optional Section]

• **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.

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- **For Lawn Replacement**

Use [insert brand name] to kill a (an old) (an unwanted) lawn and (its) weeds before planting (a) new lawn (OR prior to laying a patio, sidewalk, or driveway).

[Alternate text] For lawn replacement use [insert brand name] to kill lawn and (&) weeds before planting new lawn.

- Skip one mowing before spraying.
- If soil is dry, water before application and 2 to 3 days after application.
- Wait 7 days after last application to rake, till or replant with seed or sod.

[Alternate text]

- Wait 7 days for weeds and lawn to die. Repeat if necessary.
- Rake or till to prepare area for planting seed or sod.
- (If green patches remain after 7 days, reapply.)

- **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.

- **For Flowerbed and Garden (Plot) Preparation**

Use [insert brand name] to kill weeds, grasses and brush before planting flowers, fruits, vegetables, trees or shrubs.

- If soil is dry, water before application and 2 to 3 days after application.
- Apply evenly over treatment area.
- (Wait 4 to 6 days for product to kill plants then cleanup plant refuse and till soil.)
- Wait (at least) 1 day before planting flowers, trees and shrubs. (Refer to the **When To Replant** section for planting intervals for fruits and vegetables).

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WHEN TO REPLANT [OPTIONAL SECTION]

- All ornamental flowers, trees and shrubs may be planted **1 day after** application.
- The following berries may be planted **1 day after** application:
Blackberry, Blueberry, Boysenberry, Cranberry, Currant, Dewberry, Elderberry, Gooseberry, Huckleberry, Loganberry, Olallieberry and(&) Raspberry (Black and(&) Red).
- The following fruits, vegetables and herbs may be planted **1 day after** application:
Artichoke (Jerusalem), Beans (all), Beet Greens, Broccoli, Brussels Sprouts, Cabbage (all), Carrot, Cauliflower, Celery, Chard (Swiss), Chicory, Collards, Endive, Horseradish, Kale, Kohlrabi, Leek, Lentils, Lettuce, Mustard Greens, Okra, Onion, Rape Greens, Parsley, Parsnips, Potato, Radish, Rhubarb, Rutabaga, Spinach, Sweet Potato, Turnip and Yams.
- The following fruits, vegetables and herbs may be planted **3 days after** application:
Corn, Cucumber, Eggplant, Garlic, Gourds, Melons (all), Peas (all), Peppers (all), Pumpkin, Squash (summer &(and) winter), Tomatillo, Tomato (by seed) and Watercress.
- Lawn grasses may be planted **7 days after** application.
- Tomatoes from transplant & (and) unlisted fruits, vegetables &(and) herbs may be planted **30 days after** application.

WHEN TO HARVEST -[OPTIONAL SECTION]

If used to control weeds around fruits or nuts, wait the following number of days before harvesting:

- Citrus (Citron, Grapefruit, Kumquat, Lemon, Lime, Mandarin, Orange, Pummelo, Tangelo, Tangerine), Guava, Papaya – **1 day**.
- Nuts (Almond, Beechnut, Brazil Nut, Butternut, Cashew, Chestnut, Filbert, Hazelnut, Hickory Nut, Macadamia, Pecan, Pistachio, Walnut) – **3 days**.
- Apple, Avocado, Banana (Plantains), Berries (except Cranberries), Dates, Figs, Grapes, Loquat, Passion Fruit, Pear, Persimmon, Pomegranate &(and) Quince – **14 days**.
- Apricot, Cherries, Nectarine, Olives, Peach, Plum and(&) Prunes– **17 days**.

HOW IT WORKS [OPTIONAL SECTION]

[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 not absorbed by plants breaks down into natural materials, without moving in or on the soil to untreated plants. (So [insert brand name] can be used over the root zone of desirable plants without injury.) Weeds (usually) yellow and wilt within hours (2 to 4 days) with complete kill in 1 to 2 weeks. (Perennial weeds such as poison ivy may take

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4 or more weeks for complete kill.)

STORAGE AND DISPOSAL

[Trigger Sprayer - Original or Foaming]

STORAGE: Rotate nozzle to closed position (Turn nozzle to OFF position)(Close nozzle on trigger sprayer). Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Quick Connect Sprayer]

STORAGE: Flip down spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer (Turn nozzle on trigger sprayer to OFF position). Snap sprayer back in place. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Pull 'N Spray]

STORAGE : Completely dispense product in sprayer prior to storage. Slide white (or other color) strip on cap back to closed position. LEAVE WAND PLUG CONNECTED TO 'T-HANDLE'. Snap wand back into place on side of container. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Pull 'N Spray II]

STORAGE : Completely dispense product in sprayer prior to storage. Rotate (twist) (sprayer) nozzle to (the) closed (OFF) position. Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside *[insert location]* with the nozzle facing down. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[EZ Sprayer and Battery Operated (Power Sprayer) Devices]

STORAGE : Rotate (twist) (sprayer) nozzle to (the) closed (OFF) position. Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside *[insert location]* with the nozzle facing down. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[All packaging types except for Pull 'N Spray]

DISPOSAL: Do not reuse container (except to refill with other Roundup products) (except to refill, (see (How To) Refill section)).

[Pull 'N Spray only]

DISPOSAL: DO NOT RE-USE EMPTY CONTAINER.

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[ALL Packaging types]

Empty 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 (REFILL) [All packaging types except for Pull 'N Spray] Optional Section

[Optional Text] This container and sprayer can be reused. Use [insert brand name(s)] to refill the container. Follow the instructions below:

[24 FL OZ]:

To this empty container add 2 fl oz of Roundup Concentrate (Roundup Concentrate Plus) (insert brand name of Reg. No. 71995-20) or 1 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

[½ GAL]

To this empty container add 5 fl oz of Roundup Concentrate (Roundup Concentrate Plus) (insert brand name of Reg. No. 71995-20) or 2½ fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

[GAL]

To this empty container add 10 fl oz of Roundup Concentrate (Roundup Concentrate Plus) (insert brand name of Reg. No. 71995-20) or 5 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

[1.33 GAL PNS II]

To this empty container add 13 fl oz of Roundup Concentrate (Roundup Concentrate Plus) (insert brand name of Reg. No. 71995-20) or 6.5 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

[6L]

To this empty container add 16 fl oz of Roundup Concentrate (Roundup Concentrate Plus) (insert brand name of Reg. No. 71995-20) or 8 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

[2 GAL]

To this empty container add 20 fl oz of Roundup Concentrate (Roundup Concentrate Plus) (insert brand name of Reg. No. 71995-20) or 10 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

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

[re-entry icon] People and pets may enter treated areas after spray has dried.

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 eyes. • Call a poison control center (insert contact telephone #) or doctor for additional 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], EPA Reg. No. 71995-32 	

ENVIRONMENTAL HAZARDS

Do not apply directly to 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. Patent No. 5,196,044; 5,703,015; 5,683,958; 6,063,733; 6,121,200; 5,469,993; D380,148; 6,170,176; 6,415,956. Other patents pending. No license granted under any non-U.S. patent(s).

Roundup is a trademark of Monsanto Technology LLC
 Pull N Spray is a registered trademark of OMS Investments, Inc.

© _____ MONSANTO COMPANY

Manufactured for
 Monsanto Company
 Lawn & Garden Products

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Roundup Weed & Grass Killer Ready-To-Use

EPA Reg. No. 71995-32

P. O. Box 418
Marysville, OH 43041
EPA Reg. No. 71995-32
Form No.
EPA Est. 239-1A-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

- [insert brand name] Kills the weed you see and the root others leave behind
- (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) For Landscaping: Use to prepare areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flowerbeds or similar plantings.
- (Use) For Lawn Renovation
- (Use) For Spot Spraying: Use in and around flowerbeds, ornamental, fruit and nut trees, grapevines, shrubs, fences, driveways and walkways
- (Use) For Wildlife Areas: Use to prepare areas for planting wildlife food. Exotic or undesirable plants can be controlled to allow for planting or recovery of native plant species. Spot treatments can be made to selectively remove unwanted plants.
- [graphics of weeds dying in 1-7 days]
- Absorbed into both broadleaf and (&) grassy weeds
- Absorbs on contact, starts working immediately
- After [graphic of dead weed]
- All Purpose Weed &(and) Grass Killer
- Allergy Sufferers – Get rid of those problematic weeds
- Alleviate allergy suffering by killing those pollen producing weeds
- Also use for large jobs such as lawn renovation and vegetable and flower garden preparation
- Approved for most (many) lawn and garden uses
- Approved for use in vegetable gardens
- Before [graphic of live weed]
- Before [weed graphics] / After [weed graphics]
- Begins absorbing on contact
- Begins working in hours, New Formula
- Brush and ivy killer
- 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
- Clear Brush Away
- Clears Brush
- Completely kills even the toughest weeds and grasses.
- Contains FastAct™ (technology)
- Contains glyphosate
- Control allergy causing weeds
- Control Poison Ivy, Poison Oak and other tough (weeds and brush)
- Control tough brush

Roundup Weed & Grass Killer Ready-To-Use

EPA Reg. No. 71995-32

- Control weeds that cause allergies
- Controls existing weeds, is not a pre-emergent
- Dead (weeds) in a day
- Dead Weeds Guaranteed
- Dead Weeds Guaranteed or Your Money Back
- Does not have soil activity
- Easy (-ier,)To Use (convenient, handy, useful, well-situated)
- Easy to store
- Easy-to-use applicator
- Economical
- Eliminate allergy causing plants without touching the plants that cause them
- Eliminate allergy causing plants (weeds) without handling (touching) them
- Eliminate plants that cause allergies
- Eliminate Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Eliminate tough weeds (poison ivy) (around cabins, camp sites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas)
- Eliminate weeds – No handling required
- Eliminate Woody Plants
- Enters the plant within one to two hours, won't wash off
- Eradicate Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Even if it rains – Roundup won't lose its effectiveness
- Exclusive Roundup formula
- Experience the Roundup Advantage (peel back this panel for detail) (see details inside / underneath this booklet) (see details on back panel)
- Fast and complete
- Fast and total
- FastAct (technology) with foam
- Fast Acting Brushkiller
- Fast Acting Brushkiller with Roundup Power
- Fast acting formula
- Fast Acting Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu)killer
- Fast results
- Fast Uptake
- Fast-acting formula absorbs to root more quickly
- Fast-acting formula works twice as fast (50% faster)
- Fastest Roundup ever
- Fastest Roundup formulation ever
- For Control of Brush that won't wash away
- For Control of Tough Weeds that won't wash away
- For general weed control - kills weeds and grasses in 2 to 4 weeks - roots and all
- For weeds that are dead in a (one) day
- Get rid of brush
- Get rid of those allergy causing plants

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Roundup Weed & Grass Killer Ready-To-Use

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- Gets to the Root in hours
- Got Tough Weeds - Get [insert brand name]
- Great for clearing brushy fields
- Great for Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Guaranteed (we guarantee it)
- Guaranteed effective: Kills over 200 types of weeds and grasses, roots and all, with [insert brand name]
- Guaranteed results (with one application)
- Guaranteed same effective results even if it rains within hours
- 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
- Ideal for spot treatment on driveways, sidewalks, and patios
- Ideal for tough to reach weeds found in flower(beds) and vegetable gardens
- Ideal for vegetable garden weed control
- Improved
- Improved extra strength formula
- Improved for tough weed control
- Improved formula, completely kills even the toughest weeds and grasses with just one application
- Increased strength for Intense Weeds
- Keeps driveways, walkways, landscaping beds, and flower gardens weed-free all season long
- Kill Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) quickly
- Kill Poison Ivy Without Contact (Handling)
- Kill Tough (Weeds and Brush) Without Contact (Touching Them, Handling Them)
- Kill Tough Weeds Quickly
- Kills (insert weed name from list)
 - Blackberries
 - Poison Ivy
 - Poison Oak
 - Thistles
 - Kudzu
 - All Types of Tough Weeds
- Kills (spray) weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, walkways.
- Kills (the toughest weeds and grasses) the root so weeds (they) don't come back
- Kills (to) the root
- Kills all types of tough weeds
- Kills almost all (annual and perennial) weeds, grasses and other unwanted plants
- Kills Brush to the Root
- Kills Brush, Weeds (& Weeds) & Grasses

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Roundup Weed & Grass Killer Ready-To-Use

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- Kills even the toughest brush
- Kills even tough weeds
- Kills existing weeds only, no residual activity in soil
- Kills Kudzu
- Kills more weeds in more places.
- Kills over 100 weeds
- Kills Poison Ivy
- Kills Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Kills Poison Ivy, Kudzu and Wild Berries
- Kills the root so weeds don't come back
- Kills the toughest weeds (always)
- Kills the weed you see and the root you don't
- Kills to the Root (in hours)
- Kills tough and hard-to-kill weeds!
- Kills tough brush down to the root
- Kills tough ivy
- Kills Tough Weeds (& Grasses) (to the Root)
- Kills tough weeds in 1 to 2 weeks
- Kills tree stumps and vines
- Kills Ugly, Annoying Weeds (Brush)
- Kills undesirable weeds and grasses
- Kills unwanted weeds and grasses, roots and all, kills to the root, kills weeds roots and all
- Kills weeds and unwanted grasses - roots and all
- Kills weeds and grasses (down to the root) (2-4 weeks-roots and all)
- Kills weeds dead
- 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
- Kills wild berries
- Kills Woody Brush, Weeds & Grasses
- Lawns and gardens can be reseeded or planted soon after treatment
- Multipurpose grass and broadleaf weed control
- New
- Next day (this weekend) results: Begins killing on contact, visible results in 24 hours
- No Mixing (necessary)
- No odor
- No Root, No Weed, No Problem
- No waiting, weeds wilt in hours
- 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

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- effectiveness)
- Only Roundup's effectiveness (exclusive formula) won't be washed away by rain or watering 2 hours (30, 45, 60, 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after treatment
 - Ornamental gardens can be reseeded or planted 1 day after treatment
 - Outdoor use only [optional graphic]
 - Overnight speed
 - Perfect for homes, buildings, cabins, campsites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas.
 - Powered by Roundup
 - Prevent Stump and Vine re-growth
 - Proven (trusted) performance: Only Roundup 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 and easy to use
 - Quick kill formula (the toughest)
 - Quick uptake, eliminates weather concerns
 - Quick visible results
 - Quick-action formula lets you see results 50% (2X) faster than other brands
 - Rainfast
 - RainFast in hours - enters the plant on contact
 - Rainproof (in hours)
 - Rainproof in two hours (30, 45, 60, 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes)) (for control that won't wash away)
 - Rapid Roundup results
 - Ready-To-Use (Brushkiller) (grass & weed killer) (Tough Weedkiller)
 - Remove allergy causing plants from your yard
 - Requires no mixing
 - Results that show
 - Rid your yard of tough (weeds and brush) (allergy causing) plants
 - [insert brand name] – control weeds with confidence (certainty, assurance)
 - [insert brand name] **Fast Acting** Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) killer
 - [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
 - [insert brand name] kills weeds and grasses in – Patios – Driveways – Sidewalks – Ornamental Gardens and other non-lawn areas
 - [insert brand name] exclusive (patented) formula (technology) kills to the root so weeds don't come back
 - Satisfaction guaranteed or we will gladly refund purchase price
 - Satisfaction guaranteed or your money back with proof of purchase

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- See results in 24 hours (in hours)
- See results on Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu)in less than a week (5/7 days)
- Speedy results
- Spray woody brush, trees and vines around houses, buildings, wooded lots, vacant lots, storage and recreational areas and along fences and driveways, or anywhere tough weeds are growing.
- Starts to kill [in] the same day
- Starts to kill in hours
- Starts to kill in/within the same day
- Starts to kill overnight
- Starts working overnight (in hours) (fast)
- Strong (-er) formula
- Strong enough to kill even the toughest brush
- Stronger (mightier, more powerful, more vigorous, more intense, more force, more brawn)
- Stronger (formula) (kills brush and poison ivy) (kills to the roots)
- Stronger Formula. Better Kill! (Complete Kill)
- Suitable for use around flower beds, trees, shrubs, fences, walks and spot treatment in lawns
- Systemic brush, grass and weed killer for spot treatment of undesirable vegetation
- Systemic grass and weed killer for spot treatment of undesirable vegetation
- The Better Brush Killer
- The Brush Killer with Brawn
- The Complete Brush Killer
- The easy (-ier) way to control brush
- The fast weed killer (starts working immediately)
- The easy way to kill tough (weeds and brush)
- The easy way to rid your yard of allergy causing plants
- Tough on weeds and grasses that cause allergies
- Tougher formula (kills to the roots)
- Tougher than the toughest weeds
- Transorb technology speeds Roundup to the root to kill even tough weeds
- Twice as fast
- Use around flower beds, trees and shrubs
- Use around fruits and vegetables
- Use as a first step for renovating or replanting your lawn
- Use as a first step for turning brushy fields into grassy areas or parks
- Use for large jobs like garden plot preparation and lawn replacement (renovation)
- Use in and around vegetable gardens
- Use to control brush along fences, paths and foundations.

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- Use to prepare sites: for large plantings, for planting flowerbeds, fruit trees, ornamentals, vegetables and gardens, and for renovating lawns
- Use to trim and edge landscape areas.
- Used by zoo's to effectively control weeds
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction.
- Visible results In 2 to 4 days
- WATER BASED [*icon*]
- Weeds start dying in 1 day
- Will not build up in soil to hurt desirable plants growing nearby
- Won't wash away (off)
- Works first time, every time (guaranteed)
- Works in hours
- Works on Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Works only when absorbed by the foliage of weeds
- Works overnight
- Works to the root in hours

[Promotional options]

- Save up to \$[x] on (your) next purchase
 - Free weed guide inside
 - Free [] with this purchase of Roundup Ready-To-Use (container size)
 - FREE REFILL
 - FREE SAMPLE
- SAMPLE NOT FOR SALE

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APPENDIX 2 – Packaging Related Claims

NET	12 FL OZ	24 FL OZ (1PT 8 FL OZ) 709 mL
	30 FL OZ	64 FL OZ (½ GAL) 1.89 L
	2L (67.7 FL OZ) 0.52 GAL;	128 FL OZ (1 GAL) 3.7 L
	4L (135.4 FL OZ) 1.05 GAL;	5 L (170 FL OZ) 1.3 GAL
	6 L (202 FL OZ) 1.58 GAL;	256 FL OZ (2 GAL) 7.7 L

Quick-Connect Sprayer (QCS):

- New
- Now
- Quick connect sprayer
- Quick &(and) easy to use
- No leaks or mess
- Easy to store (see back for instructions)

Foaming Sprayer (Quick-connect or trigger type):

- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- Targets exactly (precisely) what (the weeds) you want to spray (kill)
- Accurately targets what (the weeds) you want to spray (kill)
- Accurately targets precisely (exactly) what (the weeds) you want to spray (kill)
- Visible foam shows (targets) (let's you see) exactly (precisely) where (what) (the weeds) you've sprayed
- Visible foam
- Foam
- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- Target only what you want to kill
- See (shows) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied)
- See (shows) exactly (precisely) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied) (treated)
- See (shows) (marks) area covered (treated) (sprayed).
- (Foam) Marks (shows) treated (sprayed) weeds
- (Foam) Marks (shows) treated (sprayed) weeds for up to 5 minutes
- (Foam) Marks (shows) the weeds you've sprayed (treated)
- (Foam) Marks (shows) the weeds you've sprayed (treated) for up to 5 minutes
- Visible foam marks weeds
- Visible foam marks (shows) weeds you've sprayed (treated)
- Visible foam marks (shows) weeds for up to 5 minutes
- Visible foam marks (shows) weeds you've sprayed (treated) for up to 5 minutes
- Easily (Easy to) see where (the weeds) (what) you've sprayed (treated) (applied)

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- Easily (Easy to) see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Foam makes it easy (easier) to see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Treated (sprayed) weeds stay visible (marked) for up to 5 minutes
- Treated (sprayed) weeds can easily be seen for up to 5 minutes
- Choose foam or clear stream (no foam)
- See where you spray technology
- Marker (Foam) (Foaming) Technology
- Hit (spray) (target) precisely (exactly) what you want
- Foam marks the spot
- Foaming action
- New!
- Now!
- Accurate
- For Visible Results
- See what you've hit
- The more accurate way to spray
- The accurate way to spray
- Hit what you aim at
- Ideal for use in (flower and vegetable) gardens
- VisiSpray (technology)
- VisiMark (technology)
- VisiFoam (technology)
- VisiTech (technology)
- AccuSpray (technology)
- AccuFoam (technology)
- AccuMark (technology)
- WeedMark (technology)

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Pull 'N Spray:

- NEW
- NOW
- No more tired (achy) hands from (caused by) trigger sprayers
- No more hand fatigue (cramping from) caused by trigger sprayers
- Fast and (&) easy application
- Quickly covers large areas
- The ergonomic sprayer
- Larger (Bigger) size
- 33% larger than 1 gallon size
- Easy to use tank sprayer
- Adjustable sprayer
- 3-ft extension cord enclosed (in spray wand)
- No hand fatigue
- Continuous, adjustable spray
- No pumping
- Just pull

Pull 'N Spray II:

- 33% more
- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray (Roundup)
- The easier way to spray (Roundup)
- No (More) Hand Fatigue
- No more squeeze, squeeze, squeeze
- No (constant) pumping
- No constant trigger squeezing (pulling)
- No more pumping
- No pumping just pull (and spray)
- No pumping. Just Pull N' Spray (brand)
- (33%) More than 1 gallon size
- Precise control for maximum accuracy
- Refillable
- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Quickly covers large areas
- No more tired (aching) hands
- Fast and (&) easy application
- Easy to use tank sprayer
- Revolutionary (new) applicator

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Roundup Weed & Grass Killer Ready-To-Use

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- Change the way you spray
- Ideal for large or small jobs (areas)
- Great for large or small jobs (areas)
- Precise control – sprays (targets) only what you want
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- You're always ready to spray
- It's always ready to spray
- The easier way to kill weeds
- Targets weeds in tight places
- Save (Saves) time and energy
- One pull = (equals) 34 trigger sprays
- One pull delivers 34 trigger sprays
- New!
- Now!
- Improved Applicator (Application)!
- Improved Applicator (Application) System!
- Improved Applicator (Application) Device!
- New and Improved!
- Improved!
- PNS (PNS II)
- Pull 'N Spray (Pull 'N Spray II)
- Give your hands a break
- Continuous spray
- Targeted spray
- Accurate
- Targets weeds
- Convenient

EZ Sprayer:

- (33%) More than 1 gallon size
- 33% more
- Accurate
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Change the way you spray
- Consistent spray for maximum accuracy
- Continuous spray
- Continuous, adjustable spray
- Convenient
- Easy to use tank sprayer
- EASY-TO-USE
- Fast and (&) easy application

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Roundup Weed & Grass Killer Ready-To-Use

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- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- New and Improved!
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No more pumping, no more pulling, just spray
- No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- One pull = (equals) X trigger sprays
- One pull delivers X trigger sprays
- Precise control – sprays (targets) only what you want
- Precise control for maximum accuracy
- Quick & Easy to Use
- Quickly covers large areas
- Revolutionary (new) applicator
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- Targets weeds in tight places
- The easier way to kill weeds
- The easier way to spray (Roundup)
- The easy way to spray (Roundup)
- You're always ready to spray

Battery Operated Trigger Sprayer (Power Sprayer):

- (33%) More than 1 gallon size
- Accurate
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Batteries included
- Battery Operated
- Change the way you spray
- Consistent spray for maximum accuracy

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Roundup Weed & Grass Killer Ready-To-Use

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- Continuous spray
- Continuous, adjustable spray
- Convenient
- Easy to use tank sprayer
- EASY-TO-USE
- Fast and (&) easy application
- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- New and Improved!
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No more pumping, no more pulling, just spray
- No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- Power Sprayer (for large areas)
- Precise control – sprays (targets) only what you want
- Precise control for maximum accuracy
- Quick & Easy to Use
- Quickly covers large areas
- Revolutionary (new) applicator
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- Targets weeds in tight places
- The easier way to kill weeds
- The easier way to spray (Roundup)
- The easy way to spray (Roundup)
- The fast (-er) way to spray
- X% more (than 1 gallon size)
- You're always ready to spray

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APPENDIX 3 – Packaging Related Instructions

QUICK CONNECT SPRAYER DEVICE [illustrations]

1. Remove sprayer. Pull cord/tubing **ALL THE WAY OUT.**
2. Insert (color of plug) plug into spout (on cap) until it clicks.
3. Flip up spout. Open nozzle at end of sprayer. (Select desired nozzle position, Foam (Marker) or Stream (Spray)(No Marker)(No Foam))

PULL ' N SPRAYER DEVICE [illustrations]

1. Detach green (or other color) wand. Pull plug and tubing from bottom of wand. Insert plug firmly into 'T-handle' until it clicks. **ONCE CONNECTED, PLUG CANNOT BE REMOVED WITHOUT DAMAGING 'T-HANDLE'.**
2. Slide white (or other color) strip on cap, then grab 'T-handle' and pull all the way up. **JUST PULL UP – NO NEED TO PUMP.**
3. Point wand at unwanted weeds or grasses and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern.
4. Pull 'T-handle' again as needed to continue spraying. **JUST PULL UP – NO NEED TO PUMP.** When finished, push 'T-handle' gently down to cap and follow storage instructions.

[Optional Instructions on PNS wand] **IMPORTANT!** Follow directions and illustrations on back of container to assemble and use Pull 'N Spray correctly.

PULL ' N SPRAY II DEVICE [illustrations]

[Applicator Device Directions]

Illustration # 1

- Remove sprayer from side carrier and unwrap hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks.
- Flip up spout.

Illustration #2

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops to ready the sprayer.

Illustration #3

- Adjust (twist) nozzle (at the end of sprayer) to (the) desired spray setting (pattern) (foam or spray).

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B9

Illustration #4

- Press and hold button on sprayer to begin spraying and hold down for continuous spray.
- Pull ring at sprayer bottom again as needed to continue spraying.

[Optional Instructions on PNS handle] PULL OUT SLOWLY (AND HOLD FOR (X) SECOND(S)).

EZ SPRAYER DEVICE [illustrations]

Illustration # 1

- Remove bottle cap.
- Remove sprayer from side carrier and unwrap hose completely.
- Attach wand to sprayer handle.
- Insert pump shaft into bottle and hand tighten cap.

Illustration # 2

- To prime, gently pump handle 1 to 5 times depending on desired spray duration.

Illustration #3

- Press and hold button on sprayer to begin spraying.
- Pump handle again as needed to continue spraying.

BATTERY OPERATED SPRAYER DEVICE [illustrations]

Illustration # 1

- Remove sprayer from [insert location] and unwrap hose completely (Remove sprayer from side pocket.)
- [Optional Text] Locate the battery compartment (on sprayer) [insert optional location of battery compartment] (with nozzle in OFF position) (remove battery door) (open battery cover by lifting tab). Install batteries (insert batteries as shown) (remove plastic wrap from each battery (and reinstall)) (remove plastic terminal shield) and close battery compartment door (replace battery cover until it clicks into place).
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks. (Attach coupler to the cap).
- [Optional text] Flip up spout.
- [Optional text] Spout must remain up or applicator will not spray.

Illustration # 2

- Twist (adjust) nozzle (at end of sprayer) to (the) desired spray setting (pattern) (foam or spray).

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[Alternate text] Twist (turn) nozzle at end of sprayer to adjust spray pattern to coarse spray (to desired spray setting (foam or spray)).

Illustration # 3

- To prime sprayer, position sprayer level with bottle.
- Point sprayer away from body.
- Grasp sprayer by the handle.

Illustration # 4

- (Aim at center of weed) Press and hold button on sprayer to begin spraying. (Could (may) take up to 20 seconds to prime the sprayer)
[Alternate text] Simultaneously press the safety button and sprayer button to begin spraying. Safety button can (then) be released (to continue spraying).
Release button (trigger) to stop spraying.
- *[Optional text]* Hold (button) for continuous spray.
- *[Optional text]* When finished, twist (turn) nozzle to OFF (closed) position and flip down (color of spout) spout on cap.

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TROUBLESHOOTING SECTION FOR BATTERY-OPERATED SPRAYER [OPTIONAL SECTION]

Troubleshooting Tips:

Problem: Sprayer does not spray (function)

Possible Cause: Batteries not installed properly
Solution: See instructions for correct batter placement

Problem: Sprayer makes a straining noise (Sprayer runs but nothing (no product) comes out)

Possible Cause: Nozzle is turned **Off**
Solution: Turn nozzle to (desired) spray setting (position)

Possible Cause: Red (color) plug at end of hose is not flipped up
Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks. (Attach coupler to the cap) and flip up spout

Possible Cause: Sprayer is not primed
Solution: Press and hold button on sprayer for about 20 (10, 15, 30) seconds to prime the sprayer

Problem: Spray pattern is weak (or uneven) (product flow is uneven or dribbles out of nozzle)

Possible Cause: Weak batteries
Solution: Install a fresh set of batteries

Possible Cause: Red (color) plug at end of hose is not flipped up
Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks. (Attach coupler to the cap) and flip up spout

Possible Cause: Product supply is low
Solution: Refill container with product

Possible Cause: Nozzle not fully open
Solution: Turn nozzle to (desired) spray setting (position)

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Description of Changes for 071995-00032.20030828.pdf

This label notification incorporates the following changes:

- Deletion of the 1st Aid box reflecting the new Category IV classification for eye irritation.
- Minor formatting and grammatical changes.