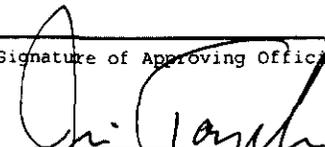


71995-33

9/9/2002

1/20

 <p>U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (H7505C) 401 "M" St., S.W. Washington, D.C. 20460</p> <p>NOTICE OF PESTICIDE: <u> x </u> Registration <u> </u> Reregistration</p> <p>(under FIFRA, as amended)</p>	EPA Reg. Number: 71995-33	Date of Issuance: SEP 9 2002
	Term of Issuance: Conditional	
	Name of Pesticide Product: MON 78999 Herbicide	
Name and Address of Registrant (include ZIP Code): Monsanto Company 600 13 th Street, N.W. Suite 660 Washington, DC 20005		
<p>Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</p> <p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.</p> <p>Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This product is conditionally registered in accordance with section 3(c)(7)(A) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) provided that you:</p> <ol style="list-style-type: none"> Submit the following data performed according to the guidelines within 18 months from the date of this letter. <ol style="list-style-type: none"> Guideline 830, Subgroup A, Product Chemistry Data Requirements Guideline 830, Subgroup B, Product Chemistry Requirements Submit/cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data. Make the labeling changes listed below before you release the product for shipment. <ol style="list-style-type: none"> Add the phrase "EPA Registration No. 71995-33". On page 2 delete or clarify "dense" fields and trails. In Appendix 1, the following phrases are not acceptable and may not be used on any product label. 		
Signature of Approving Official: 	Date: 9-9-02	

1. Brush Tough Weeds away with "insert brand name"
 2. Protect your family against poison ivy and other hazardous plants
 3. Protect your property-Eliminate Poison Ivy, Poison Oak, and other hazardous weeds
 4. Provides peace of mind
 5. Really Fast
 6. Superior Results
 7. The best weed killer you can buy (we guarantee it)
 8. The Power Brush Killer
 9. The Responsible choice
 10. The Responsible way to kill tough weeds and grasses
 11. Works first ~~time~~ every time
- d. The statement in Appendix 1 "Controls Poison Ivy, Poison Oak, and other **touch** plants, should read ...other **tough** weeds.
- e. The statements that include the phrases poisonous plant, noxious plants, or hazardous plants must list specific plants or be deleted from the label.
3. Submit three(3) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of labeling is enclosed for your records.

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[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.]

MON 78999 Herbicide

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

ACCEPTED
 SEP - 9 2002
 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No 71995-33

KEEP OUT OF REACH OF CHILDREN - CAUTION

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

NET _____ fl. oz: [6, 8, 9, 12, 24, 30, 40, 54 (0.42 gallon), 59 (0.46 gallon), 64 (0.5 gallon), 128 (1 gallon)]

Open Resealable Label for directions & Precautions
Press to Reseal

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 [When calculating no. weeds treated, 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 AND(&) 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 lots or vacant lots • Dense fields and trails • Other areas in 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

- Adjust nozzle to a coarse spray.
- [For Foaming package] Turn nozzle to desired position - FOAM (MARKER) or STREAM (SPRAY) (NO MARKER) (NO FOAM). FOAM (MARKER) marks weeds for up to (X) minutes, allowing you to easily see where you've sprayed. STREAM (SPRAY) (NO MARKER) (NO FOAM) provides coarse spray that does not foam. Spray the weeds or grasses you want to kill until thoroughly covered with foam or

liquid.

- *[For Pull 'N Spray package]* Follow illustrations and instructions above. Point wand at unwanted weeds or grasses and push button to begin spraying. Twist nozzle at end of wand to adjust spray pattern. Pull 'T-handle' again as needed to continue spraying. **JUST PULL UP – NO NEED TO PUMP.**
- *[For Pull 'N Spray II package]* Follow illustrations and instructions above to prime (ready) the sprayer. Twist nozzle at end of sprayer to adjust spray pattern. Point sprayer at unwanted weeds or grasses and press sprayer button to begin spraying. Hold down for continuous spray. Pull ring at sprayer bottom again as needed for additional spraying.
- Spray the weeds or grasses you want to kill until thoroughly wet.
- When spot treating weeds in a flower (bed) or vegetable garden, shield desirable plants from drift with a sheet of cardboard or plastic. If desirable plant is accidentally sprayed, rinse off immediately with water.

OR

- When spot treating weeds around desirable plants shield plants from drift with a sheet of cardboard or plastic. If desirable plant is 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 *[insert brand name]* kills lawn grasses.

WHEN TO APPLY

- 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).
 - Spray (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 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.
- *[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.
 - All ornamental flowers, trees and shrubs may be planted **1 day after** application.

ADDITIONAL TIPS

- **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.

- **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.)

[Alternate section]

- (Great) [insert brand name] Project: Lawn Renovation

Use [insert brand name] to kill sections of a weed-infested lawn before reseeding.

- Apply [insert brand name] to lawn weeds and grasses
- Wait 7 days after application to rake, till or replant with seed or sod.
- Work (1" of) Scotts Lawn Soil with Starter Fertilizer into existing soil, mixing well.
- For thick, green grass – guaranteed -- spread Scotts Pure Premium (or other Scotts grass seed) and water regularly (daily) to keep area moist (follow package instructions).
- For best results, add a thin layer of Scotts Miracle-Gro Sphagnum Peat Moss over the area to help seeded area stay moist throughout germination period.

- **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 & 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)

[Alternate section]

- (Great) [insert brand name] Project: Flower Garden Preparation

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

- Apply [insert brand name] to vegetation in planting bed
- (Wait 4 to 6 days for product to kill plants then cleanup plant refuse and till soil.)
- Wait (at least) 1 day after application before planting flowers, trees, and shrubs. (Refer to the **When To Replant** section for planting intervals for fruits and vegetables)
- For best results, add 3" of Miracle-Gro Garden Soil to your garden. Rototill or spade to a depth of 6", mixing well.
- Feed (new) plants every 2 weeks with Miracle-Gro Plant Food (follow package instructions).

WHEN TO REPLANT

- 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

[*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 ([*insert brand name*]) 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 yellow and(&) wilt within 2 to 4 days (hours)with complete kill in 1 to 2 weeks. (Perennial weeds such as poison ivy may take 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. Twist sprayer nozzle to the OFF position. Flip down (color of spout) spout on cap. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Place sprayer back inside carrier on bottle with the nozzle facing down. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

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DISPOSAL: Do not reuse container (except to refill, see **How To Refill** section).

[Pull 'N Spray only]

DISPOSAL: DO NOT RE-USE EMPTY CONTAINER.

[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 *[All packaging types except for Pull 'N Spray]*

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) *(or insert brand name for 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) *(or insert brand name for 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) *(or insert brand name for 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) *(or insert brand name for 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) *(or insert brand name for 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) *(or insert brand name for Reg. No. 71995-20)* or 10 fl oz of Roundup Super Concentrate then fill with water very slowly to avoid foaming.

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 area 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 #) 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 #) for emergency medical treatment information. • This product is identified as [<i>insert brand name</i>], EPA Reg. No. 71995-GG 	

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.

Roundup is a trademark of Monsanto Technology LLC

© _____ MONSANTO COMPANY

Manufactured for
 Monsanto Company
 Lawn & Garden Products
 P. O. Box 418
 Columbus, OH 43216-0418
 EPA Reg. No. 71995-GG
 Form No.
 EPA Est. 239-IA-3¹; 58996-MO-1^A
 Superscript is first letter of lot number
 Made in USA

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
- Brush TOUGH WEEDS away with [insert brand name]
- 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 glyphosate
- Control allergy causing weeds
- Control Poison Ivy, Poison Oak and other tough brush (poisonous plants)
- Control tough brush
- 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 (weeds) without handling (touching) them
- Eliminate plants that cause allergies
- Eliminate Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Eliminate poisonous plants (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
- Fast Acting Brushkiller Powered by Roundup
- Fast Acting Brushkiller with Roundup Power
- Fast acting formula
- Fast Acting Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu)killer
- Fast results
- Fast Uptake
- Fast
- Fast-acting formula absorbs to root more quickly
- Fast-acting formula works twice as fast (50% faster)
- Faster
-
-
-
- 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
- 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
- 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 (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 Poisonous (hazardous) (noxious) Plants (Weeds, Brush) Without Contact (Touching Them, Handling Them) *Let Plant erumpis*
- 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
- 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) (in 1 to 2 weeks) (to the root)
- 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) (1 To 2 weeks - roots & 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

- Results that show
- ✓ Rid your yard of poisonous (allergy causing) plants *Leet Plants*
 - [insert brand name] – control weeds with confidence (certainty, assurance)
 - [insert brand name] 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
- ✓ eliminate poisonous plants — *Leet Plants*
 - Satisfaction guaranteed or we will gladly refund purchase price
 - Satisfaction guaranteed or your money back with proof of purchase
 - See results in 24 hours
 - See results 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 to kill immediately
 - Starts working fast
 - Starts working in hours
 - Starts working immediately
 - Starts working overnight
 - 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
- ✓ Superior results
 - Systemic brush, grass and weed killer for spot treatment of undesirable vegetation
 - Systemic grass and weed killer for spot treatment of undesirable vegetation
- ✓ The best weed killer you can buy – guaranteed (we guarantee it)
 - 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 Power Brush Killer
- ✓ The Responsible Choice
- ✓ The Responsible Way to Kill Tough Weeds and Grasses
- ✓ The easy way to kill poisonous plants (weeds and brush) *Leet Plants*
 - The easy way to rid your yard of allergy causing plants
 - Tough on weeds and grasses that cause allergies
 - Tougher formula
 - 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.
- 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]
- Will not build up in soil to hurt desirable plants growing nearby
- Won't wash away (off)
- ✓ Works first time, every time
- 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

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)
- 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)

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)

- (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
- 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

20/20

APPENDIX 3 – Packaging Related Instructions

QUICK CONNECT SPRAYER [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 SPRAY 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.

[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 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

- Twist nozzle at end of sprayer to adjust spray pattern.

Illustration #4

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

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