

71995-36

1-19-2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

January 19, 2007

Ms. Rhonda M. Mannion
Registration Manager
Monsanto Company
1300 I (Eye) Street, N.W., Suite 450 East
Washington, DC 20005

Re: Roundup Ready-To-Use Poison Ivy & Tough Brush Killer Plus
EPA Reg. No.: 71995-36
December 21, 2006

Dear Ms. Mannion:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated December 21, 2006, for the product Roundup Ready-To-Use Poison Ivy & Tough Brush Killer Plus. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Joyce Edwards, of my staff at 703-308-5479.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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
71995-36	12/21/2006	071995-00036.20061221.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

21-Dec-06
 Date

Rhonda M. Mannion
 Name (typed)

Registration Manager
 Title

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United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number
307488

Application for Pesticide – Section I

1. Company/Product Number EPA Reg. No. 71995-36	2. EPA Product Manager Jim Tompkins	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Roundup Ready-To-Use Poison Ivy & Tough Brush Killer Plus	PM # 25	
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, N.W., Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address	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 _____	

Section – II

<input type="checkbox"/> Amendment – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Other – Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)
 Notification of label text changes.

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:				2. Type of Container	
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		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per Container	If "Yes" Package wgt.	No. per Container	<input type="checkbox"/> Other (Specify) Plant Cells
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Various		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section – IV

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

Name Dr. Russ Schneider	Title Director, Regulatory Affairs	Telephone No. (Include Area Code) (202) 383-2866
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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 	3. Title Registration Manager	6. Date Application Received (Stamped)
4. Typed Name Rhonda M. Mannion 314/ 694-8785	5. Date 21 December 2006	

MONSANTO



4/1/08

MONSANTO COMPANY
1500 ILLINOIS STREET, N.W.
SUITE 450 EAST
WASHINGTON, D.C. 20005
PHONE (202) 383-2866
FAX (202) 789-1748
<http://www.monsanto.com>

21 December 2006

Hand Delivered

Document Processing Center (NOTIF)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive, Room S4900
Arlington, VA 22202-4501

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

Subject: **Reg. No. 71995-36. Submission of Revised Master Label and Notification of Label Text Changes for Roundup Ready-To-Use Poison Ivy & Tough Brush Killer Plus.**

Dear Mr. Tompkins:

Monsanto herein submits a label notification for *Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus* (Reg. No. 71995-36), to update an existing label claims in order to facilitate state registration. The following changes are being notified to the current approved Master Label dated 15 September 2005:

- Visible results in 2 to 4 days (hours) (6 hours)
- The Pull N Spray claim was modified to reflect the current sprayer specifications
1 Pull = ~~34~~ 25 trigger sprays.
- The Consumer Guarantee Statement was added, this statement was notified under the previous Master Label dated 5 May 2003

This submission is classified as part of the Agency's Fast-Track Program therefore no fee is due.

The following documents are included in this Notification:

- Application for Pesticide (Form 8570-1)
- Five paper copies of the revised Master Label
- A CD-Rom containing the electronic label (filename: 071995-00036.20061221_notif.pdf)
- Signed Certification with Respect to Label Integrity

Should you have any questions, please contact Dr. Russ Schneider at our Washington office (202) 383-2466 or me directly at (314) 694-8785 or rhonda.m.mannion@monsanto.com.

Sincerely,

Rhonda M. Mannion
Registration Manager

cc: R. Schneider / DC Office
T. Schafer/ A2ND
File Copy

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Roundup[®] Ready-To-Use Poison Ivy & Tough Brush Killer Plus

[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.]

**Roundup[®] Ready-To-Use
Poison Ivy & Tough Brush Killer Plus**

Active Ingredients

Glyphosate, isopropylamine salt 1.0%

Triclopyr, triethylamine salt 0.1%

Other Ingredients 98.9%

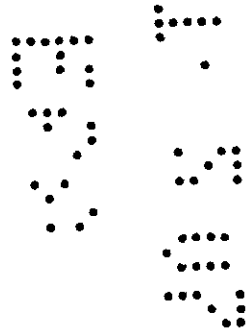
KEEP OUT OF REACH OF CHILDREN

CAUTION

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

NET ___ fl. oz

Open Resealable Label for directions & Precautions
Press to Reseal



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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

Product Facts	Container treats more than (over) _____ weeds [rate equals 200 weeds per 24 oz] Container treats _____ sq ft (approximate size of _____ tennis courts) [1 gallon treats 300 sq ft]
KILLS WEEDS	[Illustration grassy, broadleaf and woody weeds] (KILLS) ALL TYPES OF (TOUGH) WEEDS, GRASSES & BRUSH including: • Poison Ivy • Poison Oak • Poison Sumac • Wild Blackberries • Kudzu • Ragweed (OR) Kills Woody Brush & Vines Including: poison oak poison ivy wild blackberries kudzu bamboo ragweed Plus over 100 Unwanted Plants, Weeds & Grasses
WHERE TO USE	In recreational areas, (parks and sports facilities) Around homes, buildings, cabins, lodges, and camp sites On wooded and vacant lots Fields and trails Around shrubs & trees Along fences & foundations (paths) On patios, walkways & driveways Plus other areas where tough weeds are invading your yard
[telephone icon]	Questions, Comments, or (Medical) Information Call [insert contact telephone number] www.roundup.com [internet icon]

DIRECTIONS FOR USE

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

HOW TO APPLY

[Insert sprayer assembly instructions from Appendix 3]

[Optional text for Pull 'N Spray, Pull 'N Spray II, Battery Operated Sprayer, and EZ Sprayer Devices] Follow illustrations and instructions [Insert location of instructions

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

[illustrations] to ready (prime) the sprayer.

[Non-foaming Sprayers] Adjust (twist) nozzle (at end of sprayer) to (a) coarse spray.

[Foaming Sprayers] Adjust (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.

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 (as)- they may die too. Not recommended for spot weed control in lawns since *[insert brand name]* kills lawn grasses.

Note: Do not use on or around edible food or feed crops.

[Advisory statement #1: include if no lawn or plot preparation uses are included in final printed label] Do not use for lawn renovation or flower bed and vegetable garden preparation (plot preparation); instead use Roundup Concentrate or Roundup Super Concentrate.

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.

For Lawn Replacement *[if renovation use is included in final printed label then remove advisory statement #1]*

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.)

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Roundup[®] Ready-To-Use Poison Ivy & Tough Brush Killer Plus

[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 or Scotts Lawn soil 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 (Ornamental Plot) Preparation [remove advisory statement #1 if plot preparation use is included in final printed label]

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

- If soil is dry, water before application and 2 to 3 days after application.
- Apply evenly over treatment area.
- Wait (at least) 1 day before planting flowers and 30 days before planting trees and shrubs.

[Alternate section]

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

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

- Apply [insert brand name] to vegetation in planting bed
- Wait (at least) 1 day after application before planting flowers and 30 days before planting trees and shrubs.
- For best results, add 3" of Miracle-Gro Garden Soil to your garden. Rototill or

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Roundup[®] Ready-To-Use Poison Ivy & Tough Brush Killer Plus

- spade to a depth of 6", mixing well.
- Feed flowering (new) plants every 2 weeks with Miracle-Gro Plant Food (follow package instructions).

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] RAINPROOF protection: 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] 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.

[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] Plants such as ornamental flowers, trees, and shrubs may be planted 30 days after application.

WHEN TO REPLANT [OPTIONAL SECTION]

Ornamental flowers may be planted **1 day** after application:

Lawn grasses may be planted **7 days** after application.

Non-conifer trees and shrubs may be planted **14 days** after application.

Conifer trees and shrubs may be planted **30 days** after application.

HOW IT WORKS

[insert brand name] enters plants through foliage and moves systemically to the roots, killing weeds by altering the production of certain substances found in plants. Weeds usually yellow and wilt within 2 to 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.

STORAGE AND DISPOSAL

[Trigger Sprayer - Original or Foaming]

PESTICIDE 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.

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Roundup[®] Ready-To-Use Poison Ivy & Tough Brush Killer Plus

[Quick Connect Sprayer]

PESTICIDE 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]*

PESTICIDE 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]

PESTICIDE STORAGE : Completely dispense product in sprayer prior to storage. Twist (rotate) sprayer nozzle to the (CLOSED or 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.

[Battery Operated (Power Sprayer)]

PESTICIDE 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 storage location]* with the nozzle facing down. Store in original container in a safe place away from direct sunlight. Keep from freezing.

[Pump N Spray (EZ) Sprayer]

PESTICIDE STORAGE : Release pressure in tank before storing by turning the handle to allow air pressure to escape. DO NOT DISCONNECT SPRAYER HOSE FROM CAP. Retract extendable wand and hang wand back into place on container. Store 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 this container (except to refill, see (How To) REFILL section).

[Pull 'N Spray only]

DISPOSAL: DO NOT REUSE THIS CONTAINER.

[ALL Packaging types]

If Empty: Place in trash or offer for recycling if available. **If Party Filled:** Call your local solid waste agency (or 1-800-CLEANUP) for disposal instructions. Never place

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

unused product down any indoor or outdoor drain.

(HOW TO) REFILL *[All packaging types except for Pull 'N Spray]*

This container and sprayer can be reused. Use *[insert brand name of MON 78736]* to refill the container. Follow the instructions below:

[24 FL OZ]:

To this empty container add 1 fl oz (2 Tbs) of *[insert brand name of MON 78736]* then fill with water very slowly to avoid foaming.

[½ GAL]

To this empty container add 3 fl oz (6 Tbs) of *[insert brand name of MON 78736]* then fill with water very slowly to avoid foaming.

[GAL]

To this empty container add 6 fl oz (12 Tbs) of *[insert brand name of MON 78736]* then fill with water very slowly to avoid foaming.

[1.33 GAL]

To this empty container add 8 fl oz (16 Tbs) of *[insert brand name of MON 78736]* then fill with water very slowly to avoid foaming.

[6L]

To this empty container add 10 fl oz of *[insert brand name of MON 78736]* then fill with water very slowly to avoid foaming.

[2 GAL]

To this empty container add 12 fl oz (24 Tbs) of *[insert brand name of MON 78736]* then fill with water very slowly to avoid foaming.

PRECAUTIONARY STATEMENTS *[optional illustration]*

Hazards to Humans & Domestic Animals

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

[Reentry icon] People and pets may enter treated areas after spray has dried.

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes. • Call a poison control center (insert contact telephone #) or doctor for treatment advice.
Emergency Medical Information	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p> <p>You may contact (insert contact telephone #) for emergency medical treatment information.</p> <p>This product is identified as [insert brand name], EPA Reg. No. 71995-36</p>	

ENVIRONMENTAL HAZARDS

Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

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

[Insert relevant trademark disclosure statement(s)]

© ____ MONSANTO COMPANY
Manufactured (Produced) For
Monsanto Company, Lawn & Garden Products
P.O. Box 418
Marysville, OH 43041

EPA Reg. No. 71995-36
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

[Ordered alphabetically]

- (Contains) (With) FastAct (Technology)
- (Contains) FastAct Technology
- (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.
- [insert brand name] – control weeds with confidence (certainty, assurance)
- [insert brand name] Kills the weed you see and the root others leave behind
- [insert brand name] *Fast Acting* Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) killer
- 33% Faster
- Absorbs on contact, starts working immediately
- Allergy Sufferers – Get rid of those problematic weeds

- Approved for most (many) lawn and garden uses
- Before [weed graphics]/ After [weed graphics]
- Begins absorbing on contact
- Begins killing on contact Fast-acting formula
- 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.
- Consumer Guarantee: If for any reason you are not satisfied after using this product, simply send us original proof of purchase and we will replace the product or refund the purchase price.
- Control allergy causing weeds
- Control Poison Ivy, Poison Oak and other tough brush
- Control tough brush
- Control weeds that cause allergies
- Controls the hardest (toughest) weeds (brush)
- Covers up to 300 sq ft per gallon of spray
- Covers up to Y sq ft [Y = 300 x (net contents in gallons)]
- Dead Weeds Guaranteed
- Dead Weeds Guaranteed or Your Money Back
- Does not have soil activity
- Easy (-ier, iest)To Use (convenient, handy, useful, well-situated)
- 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 homes, buildings, cabins, camp sites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

- Eliminate weeds – No handling required
- Eliminate Woody Plants
- Enters the plant within (30 minutes) (1 hour) (2 hours), won't wash off
- Eradicate Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu, Bamboo
- 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 Acting (Brush Killer)
- Fast Acting Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) Killer
- Fast and complete
- Fast and total
- Fast results
- Fast Uptake
- Fast-acting formula (absorbs to the root more quickly)
- Fast-acting formula works twice as fast (50% 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
- For weeds that are dead in a (one) day
- Get rid of brush (weeds)
- Get rid of those allergy causing plants
- Great for clearing brushy fields
- Great for Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Great for use around flowers, shrubs and trees
- Guaranteed Results
- Guaranteed same effective results even if it rains within hours
- Improved for tough weed control
- Increased strength for Intense Weeds
- Keeps driveways, walkways, landscaping beds, and flower gardens weed-free all season long
- Kill Poison Ivy (Brush)(Tough Weeds)(Kudzu)quickly
- Kill Poison Ivy Without Contact (Handling)
- Kill tough weeds (Brush) without contact (Touching Them, Handling Them)
- Kill tough weeds quickly
- Kill tough weeds (& Brush) without handling
- Kills (insert weed name from list)
 - Poison Ivy
 - Poison Oak
 - Blackberries
 - 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
- Kills (unwanted) weeds (grasses, brush, woody plants, vines) roots and all
- Kills 100+ tough weeds, plus over 100 additional weeds
- Kills all types of tough weeds
- Kills even the toughest brush

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Roundup[®] Ready-To-Use Poison Ivy & Tough Brush Killer Plus

Kills over 100 weeds
Kills Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
Kills the root (so weeds don't come back)
Kills the root(s)! First Time! Every Time! (Guaranteed)
Kills the toughest brushy weeds
Kills the weed you see and the root you don't
Kills tough and hard-to-kill weeds!
Kills tough brush down to the root
Kills tough ivy
Kills tough weeds
Kills Ugly, Annoying Weeds (Brush)
Kills unwanted weeds and grasses, roots and all, kills to the root, kills weeds roots and all
Kills vines
Kills weeds and grasses in 1 To 2 weeks
Kills Weeds Dead
More effective
Multipurpose grass & broadleaf weed control
NEW
New formula (formulation)
No Mixing
No root. No weed. No problem.
Now
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; 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 (use around) homes, buildings, cabins, campsites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas.
Powered by Roundup
Proven (trusted) performance: Only Roundup works first time, every time – and has for 25 years
Provides maximum control
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 (Rainproof)
Rainfast (rainproof) in 2 hours (30, 45, 60, 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) for control that doesn't wash away
Rainfast in 2 hours (30, 45, 60, 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) - enters the plant on contact
Rapid Roundup results
Ready-To-Use

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

Results in 1 day (24 Hours)
 Rid your yard of poison ivy (tough brush)
 Roundup's effectiveness (exclusive formula) won't wash 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
 Roundup's exclusive (patented) formula (technology) kills to the root so weeds don't come back
 Satisfaction guaranteed
 Satisfaction guaranteed or your money back with proof of purchase
 See results on Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu)in less than a week (5/7 days)(days)
 Speeds absorption to the root for complete kill
 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) (within) the same day
 Starts to kill overnight (in hours) (fast)
 Starts working (dying) in 24 hrs (1 day)
 Starts working fast
 Starts working immediately
 Starts working immediately
 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
 Stronger formula kills to the roots
 Stronger formula. Better Kill ! (Complete Kill)
 The Better Brush Killer
 The Brush Killer with Brawn
 The Complete Brush Killer
 The easy (-ier) way to control brush
 The easy way to kill tough brush
 The easy way to rid your yard of allergy causing plants
 The tough weed solution
 Tough on weeds and grasses that cause allergies
 Tougher formula (kills to the roots)
 Tougher than the toughest weeds
 Transorb (FastAct) technology speeds Roundup to the root to kill even tough weeds
 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 Roundup to control tough brush around patios, driveways, gravel and mulch beds.
 Use to control brush along fences, paths and foundations.
 Use to edge around lawns
 Use to prepare sites for large plantings, for planting flowerbeds, ornamental sites and renovating lawns
 Visible results In 2 to 4 days (hours) (6 hours)
 Water – based formula
 Weeds start dying in one day

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

With Roundup Power
Won't wash away (off)
Works first time, every time (guaranteed)
Works in 1 day (24 Hours)
Works on Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
Works systemically

[Promotional options]

Save up to \$[x] on (your) next purchase
\$[x] rebate
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 (355 mL)	24 FL OZ (1PT 8 FL OZ) 709 mL
30 FL OZ	32 FL OZ
64 FL OZ (½ GAL) 1.89 L	128 FL OZ (1 GAL) 3.7 L
2L (67.7 FL OZ) 0.52 GAL	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)

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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

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

Just pull

Pull 'N Spray II:

- 33% more
- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray [or insert brand name]
- The easier way to spray [or insert brand name]
- 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) [insert #] trigger sprays
- One pull delivers [insert #] 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

2/28

Roundup[®] Ready-To-Use Poison Ivy & Tough Brush Killer Plus

Continuous spray
Targeted spray
Accurate
Targets weeds
Convenient

Pump N Spray (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 (extendable wand)
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
Long(er) spray time with less pumping
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 pump = (equals) X trigger sprays
One pump 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

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Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

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
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

23/08

Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus

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

24/28

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 *[insert location of wand]* 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 (and hold for 2 seconds) to prime (ready) the sprayer.

Illustration #3

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

Illustration #4

Press and hold (trigger) 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))**

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SECOND(S)).

EZ SPRAYER DEVICE *[illustrations]*

Illustration # 1

Unwind hose and remove extendable sprayer wand from built-in holster.

Attach (insert color) connector to outlet fitting on cap until it clicks firmly into place.

Note: Once connected, the (insert color) hose-end connector cannot be removed.

Illustration # 2

Pointing wand tip away from face, extend wand until it clicks into its fully extended position. When fully extended, the trigger will be operational.

Note: The trigger will not operate until the wand is fully extended (to the "USE" position).

Illustration #3

Before spraying, pump the handle 10-20 times. The product is designed so that you cannot accidentally over-pressurize the unit.

To begin spraying, depress (press down) the (insert color) (thumb) button on the wand.

To adjust spray pattern, twist nozzle at the end of the wand.

[Optional text] Pump unit again as needed to continue spraying.

BATTERY OPERATED SPRAYER DEVICE *[illustrations]*

Illustration # 1

Remove sprayer from [insert location] and unwrap hose completely

[Optional Text] Locate 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 (rotate) (adjust) nozzle (at end of sprayer) to (the) desired spray setting (pattern) (foam or spray).

[Alternate text] Twist (turn) (pull out) nozzle at end of sprayer to adjust spray pattern (to coarse spray).

Illustration # 3

To prime sprayer, position sprayer level with bottle.

Point sprayer away from body.

Grasp sprayer by the handle.

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Illustration # 4

Press and hold button on sprayer to begin spraying. (Could (may) take up to 20 seconds to prime the sprayer)

[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.

IMPORTANT SPRAYER INFORMATION *[Optional Section for 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

Do not drop or throw sprayer.

Do not submerge (immerse) sprayer in water. Never place sprayer in dishwasher.

Do not use soap or other cleaning agents to clean sprayer. If necessary, clean outer sprayer surface only with damp towel.

Insert batteries in their correct (+/-) position. Remove batteries for winter storage or when storing product for long periods of time.

Always use a complete set of new batteries. Never mix alkaline, carbon-zinc, or rechargeable batteries.

Always follow the manufacturer's recommendations for battery disposal and use.

Purge *[Insert sprayer brand name]* of liquid for winter storage or place *[Insert sprayer brand name]* in a heated storage area for winter storage.

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 battery 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 071995-00036.20061221.pdf

This master label notification incorporates the following changes:

Revised Pull N Spray Claim

Addition of 6 hour visible results claim, current approved Master Label has the approved claim "*Visible results in hours*"

Added Consumer Guarantee Statement