71995-30

7/24/2008



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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

JUL 2.4 2008

Ms. Dawn Fee-White. Monsanto Company, Lawn & Garden Products 1300 I (Eye) Street, NW, Suite 450 East Washington, DC 20005

Dear Ms. Fee-White

Subject: Roundup Ready-To-Use Poison Ivy & Tough Brush Killer Plus (Update Storage and Disposal and Other Changes) EPA Registration No. 71995-36 Application Dated May 8, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended is acceptable. Amended labeling supersedes all previously approved ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

Vicka ICWallos James A. Tompkins Product Manager 25 Herbicide Branch Registration Division (7505P)

[Editorial Notes: Bracketed test [] 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.]

ACC R JUL 2 4 2008 Under the Federal Insectioids, Fungicide, and Rodenticide Acs., as amended for the pesticide registered under EPA Reg. No. 71995

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

Active Ingredients

Glyphosate, isopropylamine salt	1.0%
Triclopyr, triethylamine salt	0.1%
Other Ingredients	

Keep Out of Reach of Children CAUTION

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

NET ____ [GAL] [FL OZ]

Open Resealable Label for directions & Precautions Press to Reseal

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	[Illustration grassy, broadleaf and woody weeds]		
WEEDS	(KILLS) ALL TYPES OF (TOUGH) (THE TOUGHEST) WEEDS,		
	GRASSES, BRUSH & STUMPS including Woody Brush & Vines,		
	Poison Ivy, Poison Oak, Poison Sumac, Kudzu, Wild Blackerry (and		
	more.)		
	(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		
Italanhana	(Plus other) areas where tough weeds are invading your yard		
[telephone computer icons]	Questions, Comments, or (Medical) Information		
	Call [insert contact telephone number] Visit us on the web at www.roundup.com		
	visit us on the web at www.roundup.com visit <u>www.stoppoisonivy.com</u> for more information (to learn more.		
	visit www.stoppoisonwy.com for more mornation (to learn more.		

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, Battery Operated Sprayer, Pump N Go and EZ Sprayer Devices] Follow illustrations and instructions [Insert location of instructions

/illustrations] to ready (prime) the sprayer.

- [Non-foaming Sprayers] [Open] 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(s) is (are) accidentally sprayed, rinse off immediately with water.

IMPORTANT: Do not spray plants or grasses you like - they will die. Not recommended for spot weed control in lawns since [insert brand name] [this product] [glyphosate] 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 (Plus) 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.)

[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 (vinyl) gloves. Dispose of plants and rubber (vinyl) 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

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planting trees and shrubs.

- For best results, add 3" of Miracle-Gro Garden Soil to your garden. Rototill or 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

Glyphosate, the primary active ingredient in [*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 (24 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.)

[ALTERNATE TEXT] Glyphosate, the primary active ingredient in [Insert Brand Name] is absorbed by the weed leaves. It moves through the weed to the root, stopping the function of an essential enzyme found in plants (but not humans or animals). Weeds die, roots and all - so weeds (they) don't grow back. Kills only what you spray. Any product not absorbed by the plant breaks down into natural materials without moving in or on the soil to untreated plants.

STORAGE AND DISPOSAL

[Non-trigger sprayer]

Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[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.

[Quick Connect Sprayer]

PESTICIDE STORAGE: Flip down (insert color of spout) spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer (Turn nozzle on trigger sprayer to OFF position) (Rotate nozzle to closed 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. 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 Go [Spray] (EZ) Sprayer] PESTICIDE STORAGE:

Push the yellow button and retract the wand until the yellow button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten to store. Store in original container in a safe place away from direct sunlight. Keep from freezing.

[All packaging types]

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PESTICIDE DISPOSAL: Do not reuse or refill this container unless the directions for use allow a different concentrated or ready-to-use product to be diluted in or poured directly into the container. Refill this container according to the directions contained in the **REFILL** section.

[Alternate language] Do not reuse or refill this container unless the directions for use allow refill according to the directions contained in the (see the) (HOW TO) **REFILL** (instructions) section (for details).

[Alternate language] Nonrefillable container. Do not reuse or refill this container.

[ALL Packaging types]

If Empty: Place in trash or offer for recycling if available. **If Partly Filled**: Call your local solid waste agency (or insert contact telephone number) for disposal instructions. Never place unused product down any indoor or outdoor drain.

(HOW TO) REFILL [All packaging]

This container and sprayer can be reused. Use [*insert brand name of MON 78736 or MON 78783*] 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.

[1.25 GAL]

Use this product to refill the empty Roundup Ready-To-Use Poison Ivy Plus Tough Brush Killer [*or insert brand name for 71995-36 MON 78783*] (Pump 'N Go) container by pouring product carefully and directly into the container. DO NOT add water:

[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.

[ALTERNATE TEXT FOR 1.33 GAL]

To refill this empty container, pour product carefully and directly from the Roundup Ready-To-Use Poison Ivy Plus Tough Brush Killer [*or insert brand name for 71995-36 MON 78783*] container designated as the ready-to-use refill container. DO NOT add

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water.

[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.

FIRST AID	
lf in eyes	 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
centerYou m treatm	he product container or label with you when calling a poison control or doctor, or going for treatment. ay contact (insert contact telephone #) for emergency medical ent information.

This product is identified as [insert brand name], EPA Reg. No. 71995-36

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 patent information]

[Insert relevant trademark disclosure statement(s)]

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

EPA Reg. No. 71995-36 PPN EPA Est. 239-IA-3¹; 58996-MO-1^A Superscript is first letter of lot number Made in USA

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APPENDIX 1 – Consolidated List of Label Claims

[Ordered alphabetically]

- (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
- [Insert brand name] (This product) is absorbed by the weed leaves
- · Absorbs on contact, starts working immediately
- Allergy Sufferers Get rid of those problematic weeds

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- 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.
- (Roundup Poison Ivy Plus Tough Brush Killer) Combines the power of two (2) brush killing ingredients
- Control allergy causing weeds
- Control Poison Ivy, Poison Oak and other tough brush
- Control tough brush
- Control weeds that cause allergies
- Controls the hardiest (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
- Did You Know?
- Do NOT add water
- Does not have soil activity
- Easy (-ier, iest)To Use (convenient, handy, useful, well-situated)
- Easy to Use Fast Acting Poison Ivy and Tough Brush Killer

- 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
- 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
- Exclusive formula combines 2 (two) brush and vine killing ingredients
- 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 for visible results in (as little as) 24 hours
- 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
- Glyphosate targets an enzyme found in plants but not in people or pets
- Glyphosate, the primary active ingredient, moves through the weed to the root
- 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 (Satisfaction) [qualify guarantee]
- Guaranteed same effective results even if it rains within hours [qualify guarantee]
- 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 (the) tough(est) weeds (& Brush) without handling
- Kills (insert weed name from list)
 - Poison Ivy
 - Poison Oak
 - (Wild) 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
- Kills only what you spray. Will not affect untreated plants
- Kills over 100 weeds
- Kills Poison Ivy, Poison Oak, Poison Sumac, (Wild) Blackberry, Kudzu
- Kills the root (so treated weeds don't come back)
- Kills the root(s)! First Time! Every Time! (Guaranteed) [qualify guarantee]
- 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 [only for launch season]
- New formula (formulation)
- No Mix(ing), No Mess
- 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
- Open booklet for details
- 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.
- Pour refill (directly) into Pump 'N Go (Sprayer)(Container)
- Powered by Roundup
- Product breaks down into natural materials without moving in or on the soil to untreated

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plants

- 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 (within) 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
- 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
- Roundup (this Roundup formulation) targets an enzyme found in plants but not in people or pets
- Roundup Poison Ivy Plus Tough Brush Killer the power of 2 (two)
- 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)
- Specially formulated to kill the TOUGHEST weeds!
- · Specially formulated to penetrate waxy leaves and kill tough brush fast
- 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

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- 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 Fast and Easy Way to Kill Poison Ivy and Tough Brush
- The key ingredient in this product targets an enzyme found in plants, not in people or pets
- The tough weed solution
- This Roundup formula targets an enzyme found in plants, but not in people or pets
- 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 (1 day) 2 to 4 days (hours) (6 hours) (24 hours)
- Visit <u>www.stoppoisonivy.com</u> to learn more about how to identify and effectively eliminate tough nuisance weeds such as poison ivy and for more information about Roundup Poison Ivy Plus Tough Brush Killer
- Water based formula
- Weeds start dying in one day
- Weeds usually yellow and wilt within 1 day (24 hours)
- Where it Works
- What to Know
- Will not affect untreated plants
- 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

Great Value VALUE SIZE Pump 'N Go Refill Refill Size

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APPENDIX 2 – Packaging Related Claims

NET

12 FL OZ (355 mL)	1PT 8 FL OZ (24 FL OZ) 709 mL
30 FL OZ	1 QT (32 FL OZ)
64 FL OZ (½ GAL) 1.89 L	1 GAL (128 FL OZ) 3.7 L
0.52 GAL (67.7 FL OZ) 2L	1.05 GAL (135.4 FL OZ) 4L
1.33 GAL (170 FL OZ) 5 L	1.58 GAL (202 FL OZ) 6 L
2 GAL (256 FL OZ) 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 spraved (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:

- 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 (1) pull = (delivers) (equals) [insert #] trigger sprays
- New!
- Now!
- Improved Applicator (Application)!
- Improved Applicator (Application) System!
- Improved Applicator (Application) Device!
- New and Improved!
- Improved!
- PNS
- Pull 'N Spray
- Give your hands a break
- Continuous spray
- Targeted spray
- Accurate
- Targets weeds
- Convenient

Pump 'N Go (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
- (Up to 5 minutes of) Continuous spray
- Continuous, adjustable spray
- Convenient (extendable wand)
- Cover more ground faster
- Easy to use tank sprayer
- EASY-TO-USE
- Extendable wand provides greater accuracy without bending over
- 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 Mix(ing), No Mess
- 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
- Provides up to [insert #] Minutes of Continuous Spray
- Pump 'N Go Sprayer (system)
- Quick & Easy to Use
- Quickly covers large areas
- Revolutionary (new) applicator
- Refilla(able) Container
- 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 and easy way to kill weeds
- 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
- 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

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]

[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.
 - <u>Slowly</u> 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) SECOND(S)).

PUMP N' GO (EZ) SPRAYER [illustrations]

CUT [Illustration # 1]

1. Carefully cut the two white zip ties securing the hose and pump handle with scissors. Use caution not to cut the white hose.

CONNECT [Illustration # 2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place.

EXTEND WAND [Illustration # 3]

3. Lift sprayer wand off bottle. Push yellow button while pulling out on the wand nozzle tip. Fully extend wand until yellow button snaps into SPRAY position. (NOTE: White trigger will not function until wand is fully extended and yellow button is visible in the spray position.

PUMP [Illustration # 4]

4. Make sure handle is screwed on TIGHTLY or the bottle will not pressurize. Pump container [insert # range] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. (NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.)

SPRAY [Illustration # 5]

5. Aim wand. Spray by pushing down white trigger with thumb. Adjust spray pattern by rotating white nozzle tip up to one-half rotation. Spray weeds (and grasses) until thoroughly wet

STORE [Illustration # 6]

6. When finished spraying, push the yellow button and retract the wand until the yellow button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

DEPRESSURIZE [*Illustration #7*]

7. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure, then retighten prior to storing.

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

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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 <u>until it clicks</u>. (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.

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 <u>until it clicks</u>. (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 <u>until it clicks</u>. (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 071995-00036.200800207.PITBRTU.pdf:

Updated Storage section to add instructions for a non-trigger spray bottle

Updated disposal to include refill reference and alternate disposal language for a non-sprayer container intended as a non-dilute refill

Added marketing reference to other Roundup products as optional language Updated Appendix 1 marketing claims

Updated Pump N Go section of Appendix b at the recommendation of technical and packaging

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