

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Dawn Fee-White Monsanto Company, Lawn & Garden Products 1300 I (Eye) St., N.W., Suite 450 East Washington, DC 20005

FEB 28 2012

Subject:

Label Notification; Per PR-Notice 98-10

MON 78783 HERBICIDE EPA Reg. No. 71995-36

Date Submitted: January 26, 2012

Dear Ms. Fee-White,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 26, 2012 for the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls 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 regarding this letter, please contact Jasmine Branch at (703) 347-0351 or branch.jasmine@epa.gov.

Sincerely,

Kable Bo Davis Product Manager 25 Herbicide Branch

Registration Division (7505P)

Form Approved OMB No. 2070-0060

Please read instructions on	reverse before complet	ing form.		Form Approve	d. OMB No	0. 2070-0	060. App	proval Expires 2-28-95
			tes ection Agency		☐ R	egistra mendm	tion	OPP Identifier Number
		Application	for Pestici	de - Sec	tion I			
Company/Product Number Monsanto Lawn				Product Man James A	ager	18	3. Pi	roposed Classification
4. Company/Product (Name)			PM #		25			None Restricted
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I Street, NW; Suite 450 East Washington, DC 20005			6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name					
Check if this is a new ac	ddress							
			Section -					
Amendment – Explain	n below. conse to Agency letter o	dated		Final printed Agency lette "Me Too" Ap	er dated	esponse		ICATION
Notification – Explain				Other - Exp			LEB	2 8 2012
18 U.S.C. Sec. 1001 to wi of PR Notice 98-10 and 4 under sections 12 and 14 1. Material This Product Will	O CFR 152.46, this p of FIFRA. Be Packaged In:		Section - I	FIFRA and I	I may be si	ubject to	enforce	
Child-Resistant Packaging Yes* on file No	Unit Packaging Yes No		Water Soluble F	Packaging	2. 1	ype of Co Metal Plastic Glass		
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per Container	If "Yes" Package wgt.	No. per Container		Paper	(Specify)	
3. Location of Net Contents In Label Conta		4. Size(s) Retai Various sizes a	il Container at retail from 24 oz	to 1.5 gal	5. Location On La	of Label abel	Direction	
6. Manner in Which Label is A	Affixed to Product	Lithograph Paper glu Stenciled		Othe	r polypropy	lene glue	d	
			Section - I					
1. Contact Point (Complete its	ems directly below for it			tacted, if nece	essary, to pr			
Name Dar	Jenkins		itle U.S Agency Re	egulatory Aff	airs Mana			No. (Include Area Code) (202) 383-2851
I certify that the stateme I acknowledge that any I both under applicable la	knowingly false or misle	eading statement	achments thereto a may be punishab	are true, accu le by fine or in	rate and co mprisonmen	mplete. It or		6. Date Application Received (Stamped)
2. Signature 4. Typed Name	white		Title Registra	tion Manag	ger			
Dawn N	I. Fee-White			ary 2012				
EPA Form 8570-1 (Rev. 3-94) Previous editions a	re obsolete.		White -	EPA File C	opy (orig	ginal)	Yellow - Applicant

MONSANTO COMPANY 1300 I STREET, NW SUITE 450 EAST

http://www.monsanto.com

WASHINGTON, DISTRICT OF COLUMBIA 20005



HAND DELIVERED

January 26, 2012

Dawn Fee-White Regulatory Affairs Manager (314)694-6576

Document Processing Desk (NOTIF) Registration Division - H7505P U.S. Environmental Protection Agency One Potomac Yard 2777 S. Crystal Drive, Room S4900 Arlington, Virginia 22202

Attention:

Mr. Kable Davis, Team Lead 25

Subject:

Notification of Device Name and Instructions per PR Notice 98-10

On Master Label for EPA Reg. No. 71995-36

Dear Mr. Davis:

On September 13, 2011, the EPA approved a master label for Roundup Ready-To-Use Poison Ivy Plus Tough Brush Killer on EPA Reg. No. 71995-36. Monsanto Company Lawn & Garden Products (Monsanto) has redesigned the current Pump 'N Go bottle and sprayer. To call this out to the consumer, Marketing would like to identify this second generation bottle and sprayer combination. Therefore, Monsanto is notifying the Agency that the new device will be called Pump 'N Go 2. This has been added to the master as an alternate device call out along with an option to show as a roman numeral (II) for all references to Pump 'N Go and/or the Pump 'N Go Sprayer. Monsanto is also introducing a battery operated wand and additional marketing call-outs drawn from the battery wand appendix language have also been incorporated into this master.

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 PRNotice 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.

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 submission:

Application for Pesticide form 8570-1 Master label 071995-00036.2012126.NotifPNG2.pdf

If you have any questions regarding this submission, please contact Dan Jenkins at 202 383-2851 or me at (314) 694-6576 or via email at dawn.m.fee-white@monsanto.com.

Sincerely,

Dawn Fee-White

Regulatory Affairs Manager Cc: Monsanto DC Office

Nawn Jewethit

File

[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.]

MON 78783 HERBICIDE

[Alternate Brand Names]

Roundup® Ready-To-Use Poison Ivy & Tough Brush Killer Plus Roundup® Ready-To-Use Poison Ivy Plus Tough Brush Killer Roundup® Ready-To-Use Wild Blackberry plus Vine & Brush Killer

Keep Out of Reach of Children

CAUTION

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

Active Ingredi	ents		
Glyphosate,	isopropylamine	salt	

NOTIFICATION FEB 2 8 2012

.....1.0%

NET [GAL] [FL OZ]

[Lot number will be ink jet onto bottle]

[Back Label Cover]

Open Resealable Label for directions & Precautions

Press to Reseal[ALL SKUS] [Corner flap]

OPEN / ABRA

[Pump 'N Go (2)(II) Only] (Insert Generic Logo)

The Fast & Easy Way to Kill Weeds!

Pump N Go® (2)(II) Sprayer provides up to [insert #] minutes of continuous spray! Extendable wand provides greater accuracy without bending over.

HOW IT WORKS

[Illustration of application] Roundup® Ready-To-Use Poison Ivy Plus Tough Brush Killer is absorbed by weed leaves.

[Illustration of translocation] Glyphosate, the primary active ingredient, moves through the weed to the root.

[Illustration of dead plant] Weeds die roots and all – so they don't grow back!

[Illustration of dead roots] Kills only what you spray...Will not affect untreated plants.

DID YOU KNOW?

Roundup Poison Ivy Plus Tough Brush Killer products can be used for habitat restoration and site preparation of wildlife food plots.

(Alternate wording) This product can be used for habitat restoration and site preparation of wildlife food plots.

[Insert Circle Graphic and illustrations – generic orange logo in center]

WHERE TO USE

- · Recreational Areas
- Along Fences
- Around Trees
- · Around Flower Beds

WHAT TO KNOW

- · Rainproof in 30 Minutes
- · Visible Results in 24 Hours
- Plant 1-30 Days After Application (See booklet for details)

24 fl oz (or trigger sprayer)

HOW TO USE

[picture] Adjust nozzle

[picture] Spray weeds you want to kill

1 gal (or quick connect sprayer)

HOW TO USE

[picture] Pull tubing out

Insert into cap

[picture] Flip up spout

Adjust nozzle

Pull N Spray

HOW TO USE

[picture] Insert plug until it clicks

Flip up spout

[picture] Pull ring slowly

Press button on sprayer

Battery Wand

HOW TO USE

[picture] Connect Hose

[picture] Extend Wand, Twist Nozzle, and Spray

Press button on sprayer

Pump 'N Go (2)(11)

HOW TO USE

[picture]

Connect

[picture]

Pump

[picture]

Extend Wand

Spray

[PNG ONLY can be placed on cover or inside for both English & Spanish]
This bottle may contain an anti-theft device, either inside or on the back of the bottle. It does not affect product performance.

Este envase puede contener un dispositivo contra robos, ya sea adentro o en la parte de atrás del mismo. Esto no afecta los resultados el producto.

©(date) MONSANTO COMPANY

(note to Labeling – place company name on 2 lines as shown when posible)

Produced for Monsanto Company

Lawn & Garden Products

P.O. Box 418, Marysville, OH 43041

EPA Reg. No. 71995-36

EPA Est. 239-IA-3¹, 58996-MO-1^A, 239-MS-001^M

Superscript is first letter of lot number

Made in USA

PPN

Spec#

2DCODE

UPC

(optional section)		
Product Facts		
Container treats more than (over)	weeds	[rate equals 200 weeds per 24 oz]
Container treats sq ft (approsq ft]	ximate size of	tennis courts) [1 gallon treats 300
(optional section)		
KILLS WEEDS [optional Illus	tration grassy,	broadleaf and woody weeds]
(KILLS) ALL TYPES OF (TOUGH) (THE TOUG	HEST) WEEDS, GRASSES, BRUSH &
		n Ivy, Poison Oak, Poison Sumac,
Kudzu, Wild Blackberry (and more	2.)	

[alternate wording]

Kills Woody Brush & Vines Including:

- poison oak
- poison ivy
- wild blackberries
- kudzu
- bamboo
- ragweed
- Plus over 100 Unwanted Plants, Weeds & Grasses

WHERE TO USE

- · (Plus other) Areas where tough weeds are invading your yard
- · Around shrubs & trees
- On wooded and vacant lots
- · Fields and trails
- · Around homes, buildings, cabins, lodges, and camp sites
- Along fences & foundations (paths)
- On patios, walkways & driveways
- In recreational areas, (parks and sports facilities)

[telephone computer icons] Questions, Comments, or Information Call [insert contact telephone number]
Visit us on the web at www.roundup.com
visit www.stoppoisonivy.com for more information (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 ASSEMBLE AND USE

[Insert sprayer assembly instructions from Appendix 3]

HOW TO APPLY

[Optional text for Pull 'N Spray, Battery Operated Sprayer, and Pump N Go (2)(II) Sprayer Devices]

 Follow illustrations and instructions in the How to Assemble and Use section to ready (prime) the sprayer.

[Non-foaming Sprayers]

 [Open] Adjust (twist) nozzle at end of sprayer to (a coarse spray) (desired spray pattern.

[Sprayers with spray or stream option]

 Adjust (turn) (rotate) (twist) nozzle to (the) desired spray setting (position) (FOAM or STREAM).

[Refill Container only]

 Use this product to refill the empty Roundup Weed & Grass Killer Ready-To-Use Plus (Pump 'N Go (2)(II) Sprayer) container by pouring product carefully and directly into the container. DO NOT add water.

[all skus]

- 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.

[ALL SKUS]

IMPORTANT: Do not spray desirable plants or grasses, they will die. Not recommended for spot weed control in lawns since 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 Weed & Grass Killer Concentrate Plus or Roundup Weed & Grass Killer Super Concentrate.

ADDITIONAL TIPS [Optional Section] [Note to Labeling – if these additional tips don't fit leave off]

- 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.

CUT STUMP TREATMENT

This application will kill to the root and eliminate resprout of brush and trees. (Over time the stump will naturally disintegrate.)

- Cut living trunk or stump close to the ground.
- Drive (drill) 4 to 5 holes into the freshly cut stump
- Immediately pour undiluted product into holes
- · For small stumps, brush undiluted product onto freshly cut stump

• 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.)

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.

HOW IT WORKS

Glyphosate, the primary active ingredient in [Insert Brand Name] (this product) enters the plant through the foliage, is absorbed by the weed leaves and moves systemically 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. Kills only what you spray. Any product not absorbed by the plant breaks down without moving in or on the soil to untreated plants. Weeds yellow and wilt within days 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).

The second active ingredient penetrates waxy leaves allowing the product to enter the plant more readily.

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.

RAINPROOF protection: Rain or watering 30 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 TO) REFILL [All packaging]

This container and sprayer can be reused.

[Alternate Text Ready To Use Refill For All Sizes]

To refill this empty container, pour product carefully and directly from the [insert brand

name for ready-to-use product on EPA Reg. No. 71995-36] container designated as the ready-to-use refill container. DO NOT add water.

[Optional refill from concentrate language]

Use [insert brand name of EPA Reg. No. 71995-37] 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 EPA Reg. No. 71995-37] then fill with water very slowly to avoid foaming.

11/2 GALI

To this empty container add 3 fl oz (6 Tbs) of [insert brand name EPA Reg. No. 71995-37] 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 EPA Reg. No. 71995-37] 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] (Pump 'N Go (2)(II) Sprayer) 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 EPA Reg. No. 71995-37] then fill with water very slowly to avoid foaming.

[1.5 GAL]

To this empty container add 10 fl oz of [insert brand name of EPA Reg. No. 71995-37] then fill with water very slowly to avoid foaming.

HOW TO CLEAN [Optional Section - Battery Operated Sprayer ONLY]

- Battery operated sprayer head may be used with other Roundup brand products, it will replace any sprayer fitted with a quick-connect cap
- Before using the [Insert name of sprayer device] sprayer with other Roundup brand products, the sprayer must be thoroughly cleaned (the sprayer must be purged of remaining product).
- Disconnect sprayer unit from the quick-connect cap (Disconnect sprayer unit from the bottle cap)
- Place ONLY the end of the hose (the hose end) into a bucket of water and spray continuously for 30 seconds onto bare soil or gravel.
 [Alternate Text] Rinse sprayer and sprayer parts (hose) with water 3 times. Spray

rinse water on bare soil or gravel. Discard empty sprayer bottle as instructed in DISPOSAL section.

[Alternate Text] Rinse sprayer with water 3 times and then spray (clean) water through sprayer for 30 seconds. All rinse water should be applied to bare soil or gravel.

 Connect sprayer head to any Roundup brand product with a quick-connect cap (adaptor) (any Roundup brand product bottle compatible with the battery sprayer). [Insert brand name of sprayer]

 Failure to properly clean sprayer before using with other Roundup brand products may cause damage to your plants.

STORAGE AND DISPOSAL [Placed in standard box format per LRM chap 13] [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 Wand (Power Sprayer)]

PESTICIDE STORAGE:

Flip down [color of spout] spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and place [sprayer back] in side carrier [clip] [holder]. Store in its original container, in a safe place away from direct sunlight. Keep from freezing.

[Pump N Go 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 top of the bottle in the integrated holster with nozzle tip extended through the eyelet opening. 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]

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. (Reuse or) Refill this container according to the directions contained in the **REFILL** section.

[Alternate language] PESTICIDE DISPOSAL: 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 for non-sprayer container] **PESTICIDE DISPOSAL**: 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.

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
IF 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
• Have	the product container or label with you when calling a poison control

center or doctor, or going for treatment.

- You may contact (insert contact telephone #) for emergency medical treatment information.
- This product is identified as [insert brand name], EPA Reg. No. 71995-36

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

* 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.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

[Generic Logo]

[Insert Brand Name in English & Spanish

(insert applicable instruction along side of base label) Resealable Label for Directions & Precautions / La etiqueta re-cerrable para instrucciones y avisos de precaución. Open Booklet for Assembly and Use Instructions / Abra el folleto para ver las instrucciones para asamblea y del uso

Roundup Lawn & Garden products have the best solutions to your toughest weed problems.

- Roundup Extended Control Weed & Grass Killer products kill & prevent (weeds) for up to 4 months
- Roundup Weed & Grass Killer Ready-To-Use Plus (or insert alternate name) no mixing, no mess
- Roundup Poison Ivy Plus Tough Brush Killer products kill hard-to-control weeds Roundup Wild Blackberry Plus Vine & Brush Killer products - kill tough brush & vines
- · Roundup Weed & Grass Killer Concentrate Plus fast visible results
- Roundup Weed & Grass Killer Super Concentrate best Roundup concentrate value
- Roundup Weed & Grass Killer Sure Shot Foam target weeds in tight spaces

[insert relevant patent information]

[Insert relevant trademark disclosure statement(s)]

© [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 (LB code)
EPA Est. 239-IA-3¹; 58996-MO-1^A; 239-MS-001^M
Superscript is first letter of lot number
Made in USA
[Lot number will be ink jet onto bottle]

[Base Label]

[Generic Logo] [Insert Brand Name in English & Spanish

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
IF 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
	the product container or label with you when calling a poison control center ctor, or going for treatment.

- You may contact (insert contact telephone #) for emergency medical treatment
- information.
- This product is identified as [insert brand name], EPA Reg. No. 71995-36

[Insert container specific storage and disposal]

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

EPA Reg. No. 71995-36 PPN (LB code) EPA Est. 239-IA-3¹; 58996-MO-1^A; 239-MS-001^M Superscript is first letter of lot number Made in USA [Lot number will be ink jet onto bottle]

APPENDIX 1 - Consolidated List of Claims

- (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
- [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
- [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
- Approved for most (many) lawn and garden uses
- Before [weed graphics]/ After [weed graphics]
- Begins absorbing on contact
- 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.
- (Insert Brand Name) 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
- Do NOT add water
- Does not have soil activity
- EasyTo Use
- 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 won't wash off
- Even if it rains this product (insert brand name) won't lose its effectiveness
- Exclusive Roundup brand Formula

- · Exclusive formula combines 2 (two) effective brush and vine killing ingredients
- · Fast Acting (Brush Killer)
- Fast Acting Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) Killer
- Fast results
- Fast Uptake
- · Fast-Acting for visible results in (as little as) 24 hours
- Fast-acting formula (absorbs to the root more quickly)
- · For Control of Brush that won't wash away
- · For Control of Tough Weeds that won't wash away
- 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
- 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 all types of tough weeds
- Kills even the toughest (weeds,) 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 roots (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
- Multipurpose grass & broadleaf weed control
- No Mix(ing), No Mess
- No Mixing
- No root. No weed. No problem.
- · 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)
- 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 (2)(II) (Sprayer)(Container)
- · Product breaks down without moving in or on the soil to untreated plants
- Proven (trusted) performance: Only the Roundup brand works first time, every time and has for 30 years
- Provides maximum control
- Quick kill formula
- · Quick uptake, eliminates weather concerns
- · Quick visible results
- Rainfast (Rainproof)
- Rainfast (rainproof) in 30 minutes for control that doesn't wash away
- Rainfast in 30 minutes enters the plant on contact
- Rapid results
- · Ready-To-Use
- Results in 1 day (24 Hours)
- Rid your yard of poison ivy (tough brush)
- Exclusive (patented) formula kills to the root so weeds don't come back
- Roundup Poison Ivy Plus Tough Brush Killer products 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 the same day
- Starts to kill in hours(fast)
- Starts working (dying) in 24 hrs (1 day)

- Strong enough to kill even the toughest brush
- The Better Brush Killer
- · The Brush Killer with Brawn
- · The Complete Brush Killer
- · The easy way to kill (control) 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 tough weed solution
- · Tough on weeds and grasses that cause allergies
- Tougher than the toughest 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 [Insert Brand Name] to control tough brush around patios, driveways, gravel and mulch beds.
- Use to control brush along fences, paths and foundations.
- Use to prepare sites for large plantings, for planting flowerbeds, ornamental sites and renovating lawns
- Visible results in 24 hours (1 day)
- 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 [Insert Brand Name] products
- Water based formula
- · Weeds start dying in one day
- Weeds usually yellow and wilt within 1 day (24 hours)
- Will not affect untreated plants
- 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 inside

Free [insert free offering] with this purchase of [Insert Brand Name] (container size)

FREE REFILL

FREE SAMPLE

SAMPLE NOT FOR SALE

Great Value

VALUE SIZE

Pump 'N Go (2)(II) Refill

Refill Size

FREE [Insert Brand Name] a (insert dollar amount) VALUE

Can be used to refill the Pump 'N Go (2)(II) Sprayer

Bonus size

APPENDIX 2 – Packaging Related Claims

Quick-Connect Sprayer (QCS):

- 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)
- 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)
- See where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied)
- Shows where (the weeds you (you've) spray (sprayed) (treated)
- See (shows) (marks) area covered (treated) (sprayed).
- (Foam) Marks (shows) treated (sprayed) weeds
- (Foam) Marks (shows) the weeds you've sprayed (treated)
- Visible foam marks weeds
- Visible foam marks (shows) weeds you've sprayed (treated)
- Easily (Easy to) see where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy to see where (the weeds) (what) you've sprayed (treated)
- Foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Choose foam or clear stream (no foam)
- See where you spray technology
- Foam marks the spot
- Foaming action
- Accurate
- For Visible Results
- See what you've hit
- Ideal for use in (flower and vegetable) gardens

Pull 'N Spray:

- 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
- No more pumping
- No pumping just pull (and spray)
- (33%) More than 1 gallon size

- 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
- · Change the way you spray
- Great for large or small jobs (areas)
- 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
- · Save (Saves) time and energy
- One (1) pull = (delivers) (equals) [insert #] trigger sprays
- Pull 'N Spray
- · Give your hands a break
- Continuous spray
- Targeted spray
- Targets weeds
- Convenient

Pump 'N Go (2) (II)Sprayer:

- (XX%) More than 1 gallon size
- 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 [X] 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 (System)!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- Long(er) spray time with less pumping
- New and Improved!
- No (constant) pumping
- No (More) Hand Fatigue

- No constant trigger squeezing (pulling)
- No Mix(ing), No Mess
- · No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- · Precise control sprays (targets) only what you want
- Precise control for maximum accuracy
- · Provides up to [insert #] Minutes of Continuous Spray
- Pump 'N Go (2)(II) Sprayer
- Quick & Easy to Use
- · Quickly covers large areas
- Refill(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
- The easy way to spray
- · The fast and easy way to kill weeds
- You're always ready to spray

Battery Operated Trigger 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
- (New) Continuous Spray Wand
- Consistent spray for maximum accuracy
- Continuous spray
- Continuous, adjustable spray
- Control Wand (with extended reach)
- Control Wand (with continuous spray)
- Convenient
- Easy to use tank sprayer
- EASY-TO-USE
- (New) Extended Reach Wand
- Extendable spray wand less bending
- · Extendable (insert device name) spray wand
- · 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
- 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
- The easy way to spray
- 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 illustration	is]
[Applicator Device Directions	s]

]Wand Sticker]	
For Best Results	
Pull Out Slowly	
And Hold for	V
2 Seconds	

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 <u>until</u> it <u>clicks.</u>
- · 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 (II) 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]

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 overpressurized.)

SPRAY [Illustration # 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 push (retract) the wand until the yellow button snaps back into the original storage position. Place wand back onto the top of the bottle in the integrated holster with nozzle tip extended through the eyelet opening.

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.

[PNG (II) SPRAY WAND SILK SCREEN PRINTING - no ppn]

(Wand) STORAGE POSITION Push button and pull nozzle end. Extend to spray position. > SPRAY POSITION.

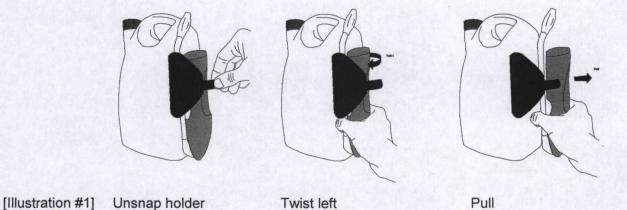
(Handle) (arrow graphic) RELEASE PRESSURE AFTER USE Push handle to cap & turn. RETIGHTEN.

[Pump 'N Go (2)(II) FRONT SHOULDER/SKIRT STICKER] Pump 'N Go ® (2)(II) Up to [X] minutes of Continuous Spray!

BATTERY OPERATED SPRAYER DEVICE [illustrations]

1. Remove

- · Open security lock from wand holder by pulling tab from locking knobs
- Remove wand [applicator name] from side (carrier) (holder) (clip).



Pull connector by slightly twisting from holder and unwrap hose completely.

Remove protective strip from battery compartment to activate batteries.



[Illustration #2]

2. Connect

Insert [color of plug] plug at end of hose into [color of spout] spout on cap <u>until it clicks</u>. Flip up spout. Spout must remain up while spraying.



[Illustration #3]

3. Extend

Flip open wand [applicator name] until it clicks and locks into position.



[Illustration #4]

4. Spray

 Twist nozzle at end of nozzle [applicator name] to desired spray pattern. Ensure trigger lock is disengaged (open) (by sliding the switch back) before spraying. Hold [color of trigger] trigger for continuous spray.

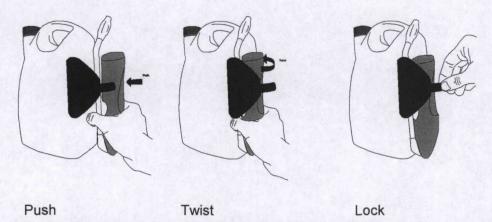


[Illustration #5]

HOW TO APPLY/USE: [icon]

Follow illustrations and instructions above. Twist nozzle at end of wand [applicator name] to desired spray pattern. Point [applicator name] nozzle away from body and hold [color of trigger] trigger for continuous spray. Release trigger to stop spray.

After Use: Twist nozzle to OFF position. Completely empty sprayer before storing. Engage trigger lock by sliding the switch forward. Flip the wand to [applicator name] closed and store on the side (holder) (clip) (carrier) with the wand up by slightly twisting back into position.

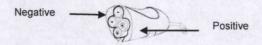


Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment at bottom of wand (insert device name) with a small screwdriver [illustration].



Remove used batteries and replace with four new AA alkaline batteries in correct position as marked inside battery compartment or per illustration.



Securely close battery compartment door and screw closed firmly. Always use a complete set of the same type when replacing batteries. Best performance is achieved with alkaline batteries. Never mix alkaline, carbon-zinc or rechargeable batteries. Dispose of used batteries according to manufacturer's instructions or in household trash.

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 alkaline 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

----Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand Battery Powered Comfort Wand [Applicator Name] Directions]-----

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

outl.

Possible Cause: Nozzle is turned Off.

Solution:

Turn nozzle to [desired] spray setting [position].

Possible Cause:

[Color of plug] 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 and flip up spout.

Possible Cause: Sprayer is not primed.

Solution:

Press and hold button on sprayer for about X (10 / 15 / 20 / 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 alkaline batteries.

Possible Cause:

[Color of plug] 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: Nozzle not fully open.

Solution:

Turn nozzle to [desired] spray setting [position].