

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 28, 2019

Ona Maune Lawn & Garden Regulatory Affairs Manager Monsanto Company, Lawn & Garden Products 1300 I Street, NW, Suite 450 East Washington, DC 20005

Subject: Label Amendment – update formatting and add alternate brand name Product Name: MON 78736 Herbicide EPA Registration Number: 71995-37 Application Date: May 14, 2018 Decision Number: 546637

Dear Ms. Maune:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

The alternate brand name **"Roundup Concentrate Wild Blackberry Plus Vine & Brush Killer"** has been added to the product record.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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

If you have any questions, please contact Reuben Baris at baris.reuben@epa.gov or at (703)305-7356.

Sincerely,

Mindy Onder for

Reuben Baris Product Manager 25 Herbicide Branch Registration Division (7505P) Office of Pesticide Programs

Enclosure

MASTER LABEL FOR EPA REG. NO. 71995-37

Primary Brand Name: **MON 78736 Herbicide**

Alternate Brand Names:

Roundup Concentrate Poison Ivy Plus Tough Brush Killer Roundup Concentrate Poison Ivy & Tough Brush Killer Plus Roundup Concentrate Wild Blackberry Plus Vine & Brush Killer Roundup Concentrate Wild Blackberry Plus Vine and Brush Killer

A C C E P T E D 03/28/2019

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. _____

71995-37

Editorial Notes:

Bold, italicized text is information for the reader and is not part of the label. [Bracketed text [] is optional text and a 'place holder' for graphics]. Text separated by a backslash '/' denotes 'and/or' options. Refer to APPENDIX 1 for Consolidated List of Label Claims; APPENDIX 2 for Packaging Related Claims.

[Insert Brand Name and Logo]

[Insert Claims from Appendix 1 or 2] [Insert Graphics]

ACTIVE INGREDIENTS:

Glyphosate, isopropylamine salt [†]	18.0%
Triclopyr, triethylamine salt ^{††}	
OTHER INGREDIENTS	
TOTAL	100.0%

[†]Contains 1.2 lb. glyphosate acid equivalent and ^{††} 0.13 lb. triclopyr acid equivalent per US gallon.

Keep Out of Reach of Children

CAUTION

See [back/ side] [panel/ booklet/ label] for [additional] first aid & precautionary statements. *Alternative Text:* [See container label for [complete] use directions, first aid and precautionary statements.]

NET [Insert Net contents FL OZ or GAL, see Appendix 2] [Insert Metric Conversion] Net contents of final printed labeling based on various commercial sizes to be marketed

[Insert 2D code/ PPN code/ LB code]

Optional Instructions for Booklet

[OPEN/ ABRA] [Open booklet for details] [Press to Reseal] [Resealable Label for Directions & [Precautions/ First Aid]]

[DID YOU KNOW?]

[Insert Brand Name for EPA# 71995-37] [Insert Claims from Appendix 1 or 2] [Insert Graphics]

Optional Roundup[®] Graphics Wheel with the following Where To Use, What To Know and How To Use components

WHERE TO USE [Insert Graphics]

- [Around Trees [& Shrubs]]
- [Along Fences]
- [Recreational Areas]

WHAT TO KNOW [Insert Graphics]

- [Rainproof [in/ as fast as] 30 Minutes]
- [Visible Results [in/ as fast as] 24 Hours]
- [Plant 7-30 Days After Application[*] [*/(see booklet for details)]

HOW TO USE [Insert Graphics]

- [Add 6 fl oz per Gallon of Water]
- [Use a Tank Sprayer/ Mix into Tank Sprayer]

Anti-theft device statement: [This bottle [may] contain[s] an anti-theft device[, either inside or on the back of the bottle].] [It does not affect product performance.] Alternative Text: [Security device included/ [This/ bottle] contains security device.]

©[Insert Year] [Monsanto Company] [Insert Company Name] [Produced/ Manufactured/ Distributed] [for/ by]] [Monsanto Company Lawn & Garden Products] [Insert Company Name] [P.O. Box 418 Marysville, OH 43041] [Insert Address] [www.roundup.com]

EPA Reg. No. 71995-37 EPA Est. 239-IA-3^I, 239-MS-001^M [Insert Additional Establishments] Superscript is first letter of lot number

[Made in/ Manufactured in/ Produced in/ Assembled in/ Product of] [USA/ [Insert Country]] [with [Insert# %] or more US parts/ with over [Insert# %] US parts/ with foreign and domestic parts]]

[Insert 2D code/ PPN code/ LB code] [Insert UPC Barcode/ Proof of Purchase]

[Insert LOT number or LOT number will be printed directly on the container]

Optional Section: PRODUCT FACTS

[[KILLS] [ALL TYPES OF/ TOUGH/ THE TOUGHEST] WEEDS, GRASSES, [WOODY] BRUSH, STUMPS [AND/ &] VINES] [including] [Poison Ivy/ Poison Oak/ Poison Sumac/ Kudzu/ Wild Blackberry/ Honeysuckle/ Bamboo/ Ragweed [or Insert from Weed List]] [and other broadleaf, grassy weeds [and/ &] brush.] [(as listed)/ as listed/ below/ on the [product] label]

[[Kills/ Controls] weeds, grasses [and/ &] brush [including/ such as] *Alternative Text:* [Weeds [grasses/ [&/ and]/ brush] controlled [include:]] [Bermudagrass, Black Medic, Buckhorn Plantain, Buttercup, Common Purslane, Curly Dock, Crabgrass, Goosegrass, Dandelion, Kentucky Bluegrass, Lambsquarters, Annual Morning Glory, Perennial Ryegrass, Spotted Spurge, Fescue, White Clover, and Yellow Nutsedge [Insert from Weed List] [and other broadleaf [and/ &] grassy weeds [brush]] [(as listed)/ as listed/ below/ on the [product] label].]

[Insert Graphic of grassy, broadleaf and woody weeds]

[Concentrated] [[Container] Makes [Insert X value from Appendix 2] gallons] [of spray solution]

[Mix with water to make [Insert X value from Appendix 2] gallons of spray solution]

[[Container] [covers/ treats] [Insert X value from Appendix 2] sq ft]

[Mix with water to cover [Insert X value from Appendix 2] sq ft]

[One/ Each] gallon [of spray solution] [cover[s]/ treat[s]] 300 sq ft.

[Spot spray or spray evenly [each gallon of spray solution] over 300 sq ft]

[Coverage may vary based on the number, type or size of weeds treated in a given area.]

[Insert Claims from Appendix 1 or 2]

HOW IT WORKS [Insert Graphics]

[Insert Brand Name/ Glyphosate/ This product] [is absorbed by the weed's leaves/ enters plants through the foliage] [or freshy cut woody stumps]. It moves through the weed to the root, stopping the function of an essential enzyme found in plants [,but not in humans].] [The second active ingredient, triclopyr, penetrates waxy leaves.] Weeds begin to yellow and wilt [as fast as/ within] [24] hours, with complete kill in 1 to 2 weeks [for [most/ annual] weeds].] [Some [established/ hard-to-kill/ perennial] weeds [such as poison ivy] may take 4 or more weeks for complete kill.] [Weeds die, roots and all – so they don't grow back.] [Individual results may vary.]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Always read and follow label directions.

WHERE TO USE [Insert Graphics]

- [On [patios/ walkways/ driveways/ gravel areas/ or/ mulch beds]
- [In [recreational areas/ fields/ & trails/ parks/ and/ sports facilities]]
- [Around [homes/ buildings/ cabins/ lodges/ and/ &/ camp sites]]
- [Along fences/ paths/ &/ foundations]
- [Around shrubs & trees]
- [On wooded and vacant lots]
- [On vines growing up poles or mature tree[s] [trunks]]
- [Freshly cut woody stumps]
- [[Plus/ other] areas where [tough] weeds are invading your yard]

WHERE NOT TO USE

Do not use on or around edible food or feed crops; or where livestock grazing is allowed. Do not use for lawn renovation or vegetable garden preparation.

MIXING [AND USE] INSTRUCTIONS [Insert Graphics]

1 Tablespoon(Tbs) = 3 teaspoons(tsp) 1 fl oz = 2 Tbs [6 fl oz = 12 Tbs]

[To measure the right amount [of product],] [use [the] [convenient] [easy-measure] cap [with] [measuring/ scale/ volume/ gradation[s]] [lines/ markings/ marks] [inside].]

TANK SPRAYER:

Use of a Roundup® brand sprayer is recommended. A plastic, fiberglass, plastic-lined steel or stainless steel sprayer may also be used. Do not mix, store or apply using a galvanized or unlined steel (except stainless steel) sprayer.

- [Peel/ Pull/ Tear/ off/ Remove] [tamper [resistant/ evident] band/ on bottom of cap.]
- Add 6 fl oz (12 Tbs) per gallon of water [using the measuring cap provided]. [Close cap tightly after use.]
- Spot treat or spray evenly each gallon of spray solution over 300 sq ft.
 Alternative Text: [One/ Each] gallon [covers/ treats] 300 sq ft.]

Optional Section: Select Applicator Type Below [HOSE-END SPRAYER:

For large areas consider using a hose-end sprayer [, such as the [Ortho® Dial N Spray®/ Insert Applicator Name]].

- [Set dial to 6 oz.
- Pour concentrate into sprayer jar. DO NOT add water.
- [Connect [garden] hose to the sprayer and turn on water.] [Spray evenly over treatment area.] [Start by spraying treatment area farthest from the faucet working backwards.]
- After spraying, unused product can be poured back into the original container. Close cap tightly after use.]

Refer to the sprayer label for additional information and cleaning instructions.

Alternative Mixing Instructions: [TO/ REFILL/ FOR] [Insert Product Size] [Insert Brand Name for EPA# 71995-36] [Insert Applicator Name] [Refillable/ Reusable/ Container[s]:] Select from the options below

- [This [concentrate/ product/ pre-measured bottle] can be used to refill the empty [Insert Product Size] [Insert Brand Name for EPA# 71995-36] [refillable/ reusable] [Insert Applicator Name/ sprayer[s]/ container[s].] [See specific container label for refill instructions.] [Do not refill or reuse this container.]
- [[Use/ Add] this [Insert product size] pre-measured [concentrate/ refill] bottle to refill the empty [Insert Product Size] [Insert Brand Name for EPA# 71995-36] [Insert Applicator Name/ sprayer/ container] by pouring product carefully and directly into the container and filling with water slowly to avoid foaming.] [Do not refill or reuse this container.]
- [Insert Applicable Container Size Instructions from List Below]
 24 fl oz: [Add 1.125 fl oz (7 tsp) to empty [Insert Brand Name for EPA# 71995-36] 24 fl oz container, then fill with water slowly to avoid foaming.]

64 fl oz: [Add 3 fl oz (6 Tbs) to empty [Insert Brand Name for EPA# 71995-36] 64 fl oz container, then fill with water slowly to avoid foaming.]

1 Gallon: [Add 6 fl oz (12 Tbs) to empty [Insert Brand Name for EPA# 71995-36] 1 Gallon container, then fill with water slowly to avoid foaming.]

1.33 Gallon: [Add [the pre-measured bottle] [8 fl oz (16 Tbs)] to empty [Insert Brand Name for EPA# 71995-36] [1.33 Gallon] container, then fill with water slowly to avoid foaming.]

HOW TO APPLY [Insert Graphics]

- Adjust [sprayer] nozzle to the desired spray setting.
- Spray the weeds, grasses or brush you want to kill until thoroughly wet.
- Spot treat or spray evenly each gallon of spray solution over 300 sq ft.
- When spot treating [weeds] around desirable plants, shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidently sprayed, rinse off immediately with water [or cut off treated area].

IMPORTANT: Do not spray plants or grasses you like – they will die. Not recommended for spot weed control in lawns since [this product/ Insert Brand Name] kills lawn grasses. [Do not allow treated weeds to come in contact with desirable plants until spray has dried.]

Optional Section: Select Any of the Options Below

[For] Poison Ivy & Poison Oak:

Spray until thoroughly wet when plants are actively growing, but at least 4 weeks before the first killing frost in the fall. Reapply if new growth appears. Contact with these plants anytime of the year can cause an allergic reaction. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.

[For] Wild Blackberry:

Spray until thoroughly wet when plants are actively growing. Reapplication is often required to kill deep roots. Dead canes should be cut down and removed.

[For] Kudzu:

For best results, apply in mid to late summer when vines are mature and actively growing. Spray vines thoroughly.

To Kill Vines Alternative Text: [For/ Vine Treatment]:

- [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 immature tree trunks with green bark, cut vines at base and treat as directed for stumps or spray regrowth. If spraying regrowth, shield shrubs and immature tree trunks from spray drift with a [sheet/ piece] of cardboard or plastic.]

To Kill Stumps

[This treatment will control or suppress many types of woody brush and trees, such as alder, bluegum eucalyptus, madrone, oak, giant reed, saltcedar, sweetgum, and tan oak.]

• [Cut living stump close to ground. Drill 4 to 5 holes into freshly cut stump and immediately pour undiluted product into holes. For smaller stumps, apply undiluted product with a paintbrush immediately to the entire freshly cut stump, including the cut surface, remaining trunk & exposed roots. Do not reuse paintbrush. Wrap the paintbrush in newspaper and put in trash.]

[**IMPORTANT:** Some trees may share the same root system. Adjacent trees having a similar age, height and spacing may signal a shared root system. Injury may occur to non-treated trees when one or more trees sharing common roots are treated.]

[For] Bamboo:

[Cut canes close to ground. Make cut just below a stem joint to create a hollow stem reservoir. Pour 2 Tbs of undiluted product into the hollow stem reservoir. Browning of the canes should occur in 7-14 days. Spray foliage if regrowth occurs.]

WHEN TO APPLY [Insert Graphics]

- Apply when weeds, grasses or brush are actively growing. *Alternative text:* [Use anytime weeds, grasses or brush are actively growing.]
- For best results, apply during warm, sunny weather above 60° F [to accelerate systemic movement from foliage to roots]. [Development of visible results could be delayed in cool or cloudy conditions.]
- [Apply/ Spray] when air is calm to prevent drift to desirable plants.
- RAINPROOF [Protection:]: Rain or watering 30 minutes after application will NOT wash away effectiveness. *Alternative Text:* [Insert Brand Name] is Rainproof in 30 minutes.]
- [Some established [perennial/ hard to kill] weeds may require a repeat application.] *Alternative Text:* [Repeat application if necessary, should new growth appear.]
- [[Note:] Brush sprayed in the fall may not be controlled until the following season. In the spring, spray regrowth if it occurs.]
- [Apply when weeds are small and before seeds form.]

APPLICATION RESTRICTIONS: Do not apply this product in a way that will contact any person or pet, either directly or through drift. Keep people and pets out of the area during application. Do not exceed the maximum yearly application rate of 61 fl oz product per 300 sq ft (9 lb triclopyr per acre).

User Safety Recommendations:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if product gets inside; then wash thoroughly and put on clean clothing.
- Clothing exposed to this product or harmful plant oils should be washed separately from other laundry with detergent and hot water.

Entry Restrictions: People and pets must not touch treated plants or enter treated areas until after spray has dried.

WHEN TO REPLANT [Insert Graphics]

- Plants such as lawn grasses and ornamental flowers 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.

Optional Section:

HOW TO CLEAN [SPRAYER] [Insert Graphics]

To clean sprayer after use, rinse sprayer and sprayer parts with water 3 times. Spray rinse water on [bare soil or gravel/ treated area]. After cleaning, sprayer may be used for other products.

Optional Section: Select from the list below KILLS ALL TYPES OF [(TOUGH)] WEEDS, GRASSES, [WOODY] BRUSH AND VINES [INCLUDING:] [Insert Graphics] [*]/ [*/(as listed)/ as listed/ below/ on the [product] label]

Kills [Insert from the list below] [and other broadleaf weeds/ and other grassy weeds/ and brush/ and vines]. *Alternative Text:* [CONTROLS WEEDS, GRASSES, BRUSH [AND/ &] VINES INCLUDING] *Alternative Text:* [WEEDS CONTROLLED INCLUDE:]

Alternative Text: [[Controls weeds, grasses and brush [including]] / [Weeds [grasses/ [&/ and]/ brush] controlled include:]] [Bermudagrass, Black Medic, Buckhorn Plantain, Buttercup, Common Purslane, Curly Dock, Crabgrass, Goosegrass, Dandelion, Kentucky Bluegrass, Lambsquarters, Annual Morning Glory, Perennial Ryegrass, Spotted Spurge, Fescue, White Clover, and Yellow Nutsedge [Insert from the list below] [and other broadleaf weeds, grassy weeds, brush [and/ &] vines]].

Annual Ryegrass	Creeping Beggarweed	Knotweed	Smooth Pigweed
Annual Morning Glory	Diffuse Lovegrass	Kochia	Sowthistle (annual)
Barnyardgrass	Dog Fennel	Lambsquarters	Spotted Spurge
Bittercress	Evening Primrose	Little Bitter Cress	Sprangletop
Black Medic	Fall Panicum	London Rocket	Stinkgrass
Black Nightshade	Fiddleneck	Maiden Cane	Sunflower
Bluegrass (annual)	Field Pennycress	Mallow	Swinecress
Blue Mustard	Field Sandbur	Mayweed	Tansy Mustard
Blue Toadflax	Filaree		Tansy Ragwort
Brassbuttons	Florida Pusley	Pennsylvania Smartweed	Teaweed
Bromegrass	Garden Spurge	Prickly Lettuce	Texas Panicum
Buckwheat	Giant Foxtail	Prostrate Spurge	Tumble Mustard
Bur Clover	Giant Ragweed	Puncture Vine	Velvetleaf
Burcucumber	Goosegrass	Purslane	Virginia Pepperweed
Buttercup	Green Foxtail	Purslane Speedwell	Wild Buckwheat
Carolina Geranium	Hairy Nightshade	Redroot Pigweed	Wild Mustard
Cheat	Hemp Sesbania	Russian Thistle	Wild Oats
Chickweed (Common)	Henbit	Sandspur	Wild Proso Millet
Chickweed (Mouseear)	Horseweed/ Marestail	Shattercane	Witchgrass
Cocklebur	Itchgrass	Shepherd's-purse	Wooly Cupgrass
Common Groundsel	Jimsonweed	Sicklepod	Yellow Foxtail
Crabgrass	Junglerice	Smooth Cat's Ear	Yellow Rocket

[Tough] Perennial Weed Control Alternative Text: [Perennials/ Perennial Weeds/ Grasses/ [&/and]/ Tough/ Brush] [(Continued)]

Alder	Dandelion	Nimblewill	Sowthistle (perennial)
Artichoke Thistle	Dewberry	Nutsedge	Spurred Anoda
Ash	Dogwood	Oak	St. Augustinegrass
Aspen (quaking)	Dollarweed	Oldenlandia	Sumac
Bahiagrass	Elderberry	Orchardgrass	Swamp Smartweed
Bamboo	Elm	Oxalis	Sweetgum
Bermudagrass	Eucalyptus	Pampasgrass	Tan Oak
Blackberry	False Dandelion	Pennywort	Thimbleberry
Blackgum	Fennel	Perennial Ryegrass	Timothy
Black Locust	Fescue species	Persimmon	Torpedograss
Bluegrass (Kentucky)	Field Bindweed	Pine	Tree Tobacco
Bluegum Eucalyptus	Giant Reed	Poison Hemlock	Trumpetcreeper
Brackenfern	Guineagrass	Poison Ivy	Vaseygrass
Broadleaf Plantain	Hawthorn	Poison Oak	Virginia Creeper
Broom (French, Scotch)	Hazel	Poison Sumac	White Clover
Buckhorn Plantain	Hemp Dogbane	Poplar	Whitetop
Canada Thistle	Honeysuckle	Primrose	Wild Barley
Cattail	Horsenettle	Purple Nutsedge	Wild Blackberry
Ceanothus	Horseradish	Quackgrass	Wild Grape
Chamise	Iceplant	Raspberry	Wild Oats
Cherry	Johnsongrass	Ragweed (Common)	Wild Rose (multiflora)
Cogongrass	Kikuyugrass	Red Clover	Wild Strawberry
Common Mullein	Knapweed	Redvine	Wild Sweet Potato
Common Pokeweed	Kudzu	Reed Canarygrass	Wild Violet
Common Plantain	Lantana	Sage	Willow
Corn Speedwell	Leafy Spurge	Sagebrush	Wirestem Muhly
Coyote Brush	Locust	Salmonberry	Yellow Nutsedge (Nutgrass)
Creeping Bentgrass	Lovegrass	Saltcedar	Yellow Poplar
Creeping Charlie (Ground Ivy)	Madrone	Sassafras	Yellow Starthistle
Crowfootgrass	Maple	Smooth Bromegrass	Zoysia
Curly Dock	Milkweed	Silverleaf Nightshade	
Dallisgrass	Mulberry	Sourwood	

[**NOTE**: Heavy lawn grass or well established difficult to control weeds, such as Bermudagrass, Nimblewill, Dandelion, or Canada Thistle may require a repeat application.]

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If Empty:** Place in trash or offer for recycling, if available. **If Partly Filled:** Call your local solid waste agency [or Insert Telephone Number] for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

KEEP OUT OF REACH OF CHILDREN

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

[Re-entry icon] People and pets must not touch treated plants or enter treated areas until 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 first 5 minutes, then continue rinsing eyes.			
	• Call a poison control center [Insert Telephone Number] 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 Telephone Number] for emergency medical treatment information. [This product is identified as [<i>Insert Brand Name</i>], EPA Reg. No. 71995-37 .]				

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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. Do not apply directly to water. Triclopyr demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

PHYSICAL OR CHEMICAL HAZARDS: Spray solutions of this product may be mixed, stored and applied using stainless steel, fiberglass, plastic or plastic-lined steel containers. DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS.

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

Optional Section *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.

Optional Section ROUNDUP BRAND FAMILY OF PRODUCTS

Visit the Roundup website to learn more about the Roundup brand family of products for the best solution to your toughest weed problems.

Alternative Text: [Roundup® Lawn & Garden products have the best solutions to your toughest weed problems.] [Visit the Roundup website, [www.roundup.com], to learn more about the Roundup brand family of products.] [Insert Claims from Appendix 1]

[Insert Graphic/ Roundup Product Family Photo]

- [Roundup Extended Control Weed & Grass Killer [plus Weed Preventer] products] [- kill & prevent weeds for up to 4 months]
- [Roundup Max Control 365 products] [- kill & prevent weeds for up to 12 months]
- [Roundup Ready-To-Use Weed & Grass Killer III/ Insert Brand Name for 71995-33] [- no mixing, no mess]
- [Insert Brand Name for 71995-33] [- kill weeds, protect desirable plants]
- [Roundup Poison Ivy Plus Tough Brush Killer products] [- kill tough, brushy, hard-to-control weeds]
- [Roundup Wild Blackberry Plus Vine & Brush Killer products] [- kill tough brush & vines]
- [Insert Brand Name for 71995-29] [- [fast visible results]
- [Insert Brand Name for 71995-25] [- best Roundup brand concentrate value]
- [Insert Brand Name for 71995-60] [- targets hard-to-spray weeds]

Optional Spanish Translations:

[Insert generic logo and brand name in English & Spanish]

[Insert Label Language in Spanish as Applicable]

Base Label Information:

[Insert generic logo and brand name in English & Spanish]

Insert applicable instruction along side of base label:

[Resealable Label for Directions & Precautions / Etiqueta resellable de instrucciones y avisos de precaución.] *Alternative Text:* [Resealable Label for Directions & First Aid/ Etiqueta resellable de instrucciones y primeros auxilios.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS & DOMESTIC ANIMALS

KEEP OUT OF REACH OF CHILDREN

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

[Re-entry icon] People and pets must not touch treated plants or enter treated areas until 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 first 5 minutes, then continue rinsing eyes.		
	Call a poison control center [Insert Telephone Number] 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 Telephone Number] for emergency medical treatment information. [This product is identified as [Insert Brand Name], EPA Reg. No. 71995-37.]			

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. Do not apply directly to water. Triclopyr demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this product in areas where soil is permeable, particularly where the water table is shallow, may result in groundwater contamination.

[PHYSICAL OR CHEMICAL HAZARDS: Spray solutions of this product may be mixed, stored and applied using stainless steel, fiberglass, plastic or plastic-lined steel containers. DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS.]

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store product in original container in a safe place away from direct sunlight. Keep from freezing. If frozen, allow to thaw and shake well before using.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. **If Empty:** Place in trash or offer for recycling, if available. **If Partly Filled:** Call your local solid waste agency [or Insert Telephone Number] for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Insert phone & computer icons] Questions, Comments or Information Preguntas, Comentarios o Información [Insert Telephone Number] [www.roundup.com]

©[Insert year] Monsanto Company [Insert Company Name] [Produced/ Manufactured/ Distributed] [for/ by]] [Monsanto Company Lawn & Garden Products] [Insert Company Name] P.O. Box 418 Marysville, OH 43041 [Insert Address]

EPA Reg. No. 71995-37 EPA Est. 239-IA-3^I, 239-MS-001^M [Insert Additional Establishments] Superscript is first letter of lot number

[Made in/ Manufactured in/ Produced in/ Assembled in/ Product of] [USA/ [Insert Country] [with [Insert# %] or more US parts/ with over [Insert# %] US parts/ with foreign and domestic parts]]

Anti-theft device statement: [This [bottle/ package] [may] contain[s] an anti-theft device [, either inside or on the back of the [bottle/ package].] [It does not affect product performance.] Alternative Text: [Security device included/ [This/ bottle] contains security device.]

[Insert Relevant Trademark Disclosure Statement(s)]

[Insert Relevant Patent Information Statement(s)] [For a list of patents, if any, covering this product or its use, please go to [Insert patent website/ www.monsantotechnology.com/lawnandgarden].]

[Insert 2D Code/ PPN code/ Insert LB code] [UPC Code/ Proof of Purchase]

APPENDIX 1: Consolidated List of Label Claims

- **Product guarantee statement for use throughout*** [Guaranteed Satisfaction/ Consumer Guarantee] If for any reason you are not satisfied after using this product, simply send us the original proof of purchase and we will [replace the product or] refund the purchase price.
- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact[, starts working immediately with visible results as fast as [24 hours/ 1 day]]
- Absorbed through the leaves, it goes all the way to the root for total kill [on weeds you directly spray]
- [Apply/ Use/ Can be used] [with confidence] [in/ on/ around/ along] [trees/ tree rings/ shrubs/ ornamentals/ houses/ buildings/ garages/ sheds/ cabins/ lodges/ barns/ buildings/ foundations/ retaining walls/ under decks/ wooded lots/ vacant lots/ dense/ fields/ trails/ storage areas/ recreational areas/ parks/ sports facilities/ camp sites/ tent areas/ fences/ fence lines/ mulch/ mulched/ paths/ pathways/ patios/ pavers/ driveways/ sidewalks/ walks/ walkways/ rockways/ gravel areas/ stairs/ [RV/ boat] parking [areas/ lots]/ or/ other areas tough weeds are growing]
- Be smarter than your weeds
- Before [Insert graphic of live weed]/ After [Insert graphic of dead weed]
- Begins absorbing on contact
- Begins [to work/ working] on contact with visible results as fast as [Insert#] hours
- Brush and [poison] 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]
- [Combines/ Uses] the power of 2 brush [and vine/ weed] killing ingredients
- Completely kills even the toughest weeds and grasses.
- Concentrated for extra value
- Concentrate[d] formula
- Consumer Guarantee* [see/ open] [booklet/ label] for details] qualify guarantee
- Contains glyphosate [&/ and] triclopyr
- Control allergy causing weeds
- Control Poison Ivy, Poison Oak and other tough brush
- Control tough brush [and weeds]
- Control [plants/ weeds] that cause allergies
- Control weeds with confidence
- Control[s] [Insert any weed[s] listed in the Weed table]
- Controls [allergy causing] [plants/ weeds] without [handling/ touching] them
- Controls the [hardiest/ toughest] [weeds/ brush]
- Controls Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu, Honeysuckle, Bamboo, [Insert weeds listed in the Weed table]
- Controls [tough/ weeds/ brush/ poison ivy] around [homes/ buildings/ cabins/ camp sites/ lodges/ tent areas/ trailers/ wooded lots/ recreational areas/ parks/ sport facilities/ and/ wildlife areas]
- Controls weeds No handling required
- Controls woody plants
- Covers Y sq ft [Y = 300 x (net contents in ounces ÷ 6)]
- Covers 300 sq ft per gallon [of spray solution]
- Dead Weeds Guaranteed* [or Your Money Back] qualify guarantee
- Does not have soil activity
- Draw the line™ [[with/ against] weeds] [in your [yard/ landscaping]]
- Economical [concentrate formula]
- Economical- mix 12 Tablespoons (6 fl oz) per gallon [of water]
- Enters the plant within 30 minutes, won't wash off
- Even if it rains after 30 minutes- [Insert Brand Name] won't lose its effectiveness
- Exclusive [Roundup brand/ Insert Brand Name] formula combines [2/ two] brush and vine killing ingredients
- For control of [tough weeds/ brush] [that won't wash away]
- For [outdoor] residential use [only]
- For weeds in your lawn, try Roundup® For Lawns
- Formulated for [outdoor] residential use

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- Helps get rid of [brush/ tough weeds]
- Helps get rid of [those] allergy causing plants
- Got Tough Weeds Get [Insert brand name/ Roundup Poison Ivy Plus Tough Brush/ products]
- Great for clearing brushy fields
- [Great/ Ideal/ Great value/ for] [large/ big] [or small] [jobs/ areas]
- [Great for/ Ideal for/ Perfect for/ tough-to-reach weeds] [use/ in/ on/ around/ along] [trees/ tree rings/ shrubs/ ornamentals/ houses/ buildings/ garages/ sheds/ cabins/ lodges/ barns/ buildings/ foundations/ retaining walls/ under decks/ wooded lots/ vacant lots/ dense/ fields/ trails/ storage areas/ recreational areas/ parks/ sports facilities/ camp sites/ tent areas/ fences/ fence lines/ mulch/ mulched/ paths/ pathways/ patios/ pavers/ driveways/ sidewalks/ walks/ walkways/ rockways/ gravel areas/ stairs/ [RV/ boat] parking [areas/ lots]/ or/ other areas tough weeds are growing]
- Great for Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Great value [makes [Insert value from Appendix 2] gallons [and/ &] [covers/ treats] [Insert Value from Appendix 2 table] sq ft
- Guaranteed [Results/ Satisfaction]* [Open booklet for details] qualify guarantee
- Hard on weeds, easy on you [*/ versus/ vs./ compared to/ hand pulling] qualify, must select from optional text
- Kill [Poison Ivy/ Tough Weeds/ Woody/ Brush/ Kudzu]
- Kill Poison Ivy Without [Contact/ Handling]
- Kill [the] tough[est] [weeds/ brush/ and/ &] without [contact/ touching them/ handling]
- Kills [all] [annual and perennial] weeds, grasses and other unwanted plants
- Kills all types of tough weeds [and brush][*]/ [*/(as listed)/ as listed]
- Kills existing [tough] weeds [& grasses] [to the root/ roots and all]
- Kills even the toughest [weeds/ brush/ and/ &]
- Kills [only] what you [directly] spray [Will not affect untreated plants]
- Kills over 200 [different/ types/ species/ kinds/ of] weeds[*]/ [*/(as listed)/ as listed/ below/ on the [product] label]
- Kills [Poison Ivy/ Poison Oak/ Poison Sumac/ Wild Blackberry/ Blackberries/ Honeysuckle/ Bamboo/ Thistles/ Kudzu/ Insert selection from weed list] [& all types of tough weeds]
- Kills [to] the root[s] so [treated] weeds don't come back [guaranteed] qualify guarantee
- Kills [to] the root[s] [Guaranteed[!/*]] qualify guarantee
- Kills [the toughest weeds and grasses to] the root so [weeds/ they] don't come back
- Kills the roots of [both] broadleaf and grassy weeds
- Kills the toughest brushy weeds
- Kills the weed you see and the root you don't
- Kills tough [brush/ ivy/ and/ hard-to-kill/ weeds] [down to the root]
- Kills [tough] weeds [grasses/ brush/ woody plants/ vines] [roots and all/ to the root]
- [Kills/ Controls/ Spray/ Target] [tough/ woody/ brush/ vines/ weeds/ grasses/ poison ivy/ [and/ &]] [in/ on/ around/ along] [trees/ tree rings/ shrubs/ ornamentals/ houses/ buildings/ garages/ sheds/ cabins/ lodges/ barns/ buildings/ foundations/ retaining walls/ under decks/ wooded lots/ vacant lots/ dense/ fields/ trails/ storage areas/ recreational areas/ parks/ sports facilities/ camp sites/ tent areas/ fences/ fence lines/ mulch/ mulched/ paths/ pathways/ patios/ pavers/ driveways/ sidewalks/ walks/ walkways/ rockways/ gravel areas/ stairs/ [RV/ boat] parking [areas/ lots]/ or/ other areas tough weeds are growing]
- Kills Ugly, Annoying Weeds [and Brush]
- Kills [unwanted] weeds [grasses/ brush/ woody plants/ vines] [clear/ down to the root/ roots and all]
- Kills vines [& [tree] stumps]
- Kills weeds clear down to the root, so weeds don't come back guaranteed qualify guarantee
- Kills weeds dead
- [Kills/ Spray] weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, [and/ &] walkways
- Kills weeds, roots and all
- Make only what you need
- Mix into [pump-up/ pressurized] tank sprayer
- Multipurpose grass and broadleaf weed control
- No root. No weed. No problem.®
- Non-staining [formula]
- Once it enters the plant, it won't wash off
- Outdoor use only [Insert Graphic]

- Penetrating Formula
- Product goes on clear and [dries clear/ stays clear/ will not stain]
- Proven performance for [more than/ 40/ Insert #] years
- [Provides] [visible] results [in/ as fast as] 24 hours
- [RainFast/ RAINPROOF/ Rainproof Protection:] [in/ as fast as] [10/ 30/ minutes] [for control that won't wash away]
- Roundup® [brand] products help you triumph over the toughest weeds
- Roundup's exclusive formula won't be washed away by rain or watering [10/ 30] minutes after treatment
- [Roundup brand's/ Our] exclusive [patented] formula [technology] kills to the root so weeds don't come back
- [Roundup Poison Ivy Plus Tough Brush Killer/ products/ Insert Brand Name] can be used for habitat restoration and site preparation of wildlife food plots
- [Roundup Poison Ivy Plus Tough Brush products/ Roundup brand[s]/ Insert Brand Name] [is/ are] [Relentless in the fight against weeds
- [Roundup Poison Ivy Plus Tough Brush products/ Roundup brand[s]/ Insert Brand Name] [is/ are] tougher than the toughest weed
- [Roundup Poison Ivy Plus Tough Brush Killer products/ [Insert Brand Name]] the power of [2/ two] [active ingredients]
- Satisfaction guaranteed* [or/ we will gladly refund purchase price/ your money back with proof of purchase] *qualify guarantee*
- Specially formulated [for tough weed control/ to kill the TOUGHEST weeds/ to penetrate waxy leaves and kill tough brush [fast]]
- Spray the leaves, not the root
- Spray the [weed/ leaves] to kill the root
- Starts working [immediately] [with visible results [as fast as] [Insert #] hours]]
- Strong enough to kill even the toughest brush
- Systemic grass and weed killer for spot treatment of undesirable vegetation
- The easy way to [kill/ control] [tough brush/ allergy causing plants] [around your yard]
- The fast & easy way to kill [Poison Ivy and Tough Brush/ weeds]
- The tough weed solution
- This exclusive Roundup formula combines 2 brush-killing ingredients
- This product can be used for habitat restoration and site preparation of wild life food plots.
- [This product/ [Insert Brand Name]] combines the power of two brush and vine killing ingredients to kill [all] weeds, grasses and other unwanted plants
- [This product/ [Insert Brand Name]] is absorbed by the weed leaves
- Tough [penetrating] formula [kills to the roots]
- Tough on weeds and grasses that cause allergies
- Tougher than the toughest weeds
- Unlike hand pulling, [Insert Brand Name/ this product] kills all the way to the roots
- Use as a first step for turning brushy fields into grassy areas or parks
- [Use] For Brush Control
- [Use] for Stump[s] [Treatment]
- [Use] [For general weed control:] Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings, and in brick and gravel walkways
- Use [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 refill [Insert Brand Name for Reg. No. 71995-36] [sprayers]
- Use to trim and edge landscape areas
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction
- Visible Results [in/ as fast as] [1 day/ 24 hours]
- Water-based formula
- Weeds usually yellow and wilt [within/ as fast as] [1 day/ 24 hours]
- Will not affect untreated plants
- Works on [Insert or select from weed list]
- Works on Poison Ivy, Poison Oak, Poison Sumac, [Wild] Blackberry, Kudzu, Honeysuckle
- Works only when absorbed by the [foliage/ leaves] of weeds
- Works systemically

Promotional Offering Options

- [Insert #] [Pre-Measured/ Concentrate/ Refill] Bottle[s] [Included/ Attached] All registered pesticide products will include EPA required labeling
- [Insert value]% Free [More] [than X] qualify
- [Insert Value]% More in Each Bottle [than X] qualify
- Insert value]% More [Value size] [than X] qualify
- [Insert Dollar Amount] Rebate
- A [Insert Dollar Amount] Value
- Bonus [Size/ Pack/ Pak]
- BONUS SIZE [Insert Value]% MORE! [than X] qualify
- Bundle Pack
- Buy [Insert # bottles] Get [Insert dollar amount/ Insert X%] Off
- Can be used in [Insert Packaging Type/ Container/ Sprayer]
- Can be used to REFILL [Insert Brand Name for EPA# 71995-36] [Insert Packaging Type/ Container/ Sprayer]
- Club [Pack/ Pak/ Size]
- Combo [Pack/ Pak/ Size]
- [Each] [pre-measured/ concentrate] [refill/ bottle] makes [Insert # Gallons]
- [Easy Mix] Refill System
- FREE [Insert Brand Name of EPA# 71995-37] a [Insert Dollar Amount] [VALUE] All registered pesticide products for promotional offerings will include EPA required labeling
- Free [Insert Container Size] [Insert Brand Name] [Concentrate/ Refill] [Included/ Attached/ Inside/ With Purchase/ Coupon] *All registered pesticide products for promotional offerings will include EPA required labeling*
- Free [Insert free offering Description] with this purchase of [Insert Brand Name] [Insert Container Size] *All registered pesticide products for promotional offerings will include EPA required labeling*
- FREE [Insert Brand Name of EPA# 71995-37] SAMPLE [Included/ Attached/ Inside/ With Purchase] All registered pesticide products for promotional offerings will include EPA required labeling
- Great Value [[makes [insert value from Appendix 2] gallons [and/ &] [covers/ treats] [Insert Value from Appendix 2 table] sq ft]
- Larger size* *qualify* *compared to [Insert bottle size]
- Larger size* [covers [Insert value] sq ft/ makes [Insert value from Appendix 2] gallons [of spray solution]]
- NEW! Use only if new package or formulation; limited use of claim for 6-months
- NOT FOR INDIVIDUAL SALE For use on individual units without barcodes, which are part of a multipack or copack
- NOW! Use only if new package or formulation
- [Part of] [Easy Mix] Refill [System]
- [Pre-Measured] [Concentrate] [Bottle/ Refill] makes 1.33 Gallons/ Insert Product Size]
- SAMPLE NOT FOR SALE All registered pesticide products for promotional offerings will include EPA required labeling
- Save [up to] \$[Insert Value] on [your] next purchase
- Tank Sprayer [With/ Plus] Concentrate
- TWIN [PACK/ PAK]
- Value [Pack/ Pak]
- VALUE [SIZE/ SIZED]

APPENDIX 2: Packaging Related Claims

Calculation of Spray and Weed Coverage

- To determine approximate quantity of spray solution by container, divide the net contents in fluid ounces by 6 fl oz per gallon. (Y= Net contents (fl oz) ÷ 6 fl oz)
- To determine how many square feet can be treated, multiply Y (gallons of spray solution) by 300 (X spray coverage= Y gallons of spray solution x 300 sq ft)

NET CONTENT/ SKU Size	Spray Coverage (X)	Spray Solution (Y)
XX FL OZ (QT or GAL) (ml or L)	Net Contents (fl oz) ÷ 6 fl oz= Y; multiply Y by 300= approximate treatment area in sq ft	Net contents (fl oz) \div 6 fl oz
6 FL OZ	300 sq ft	Makes 1 gallon
8 FL OZ	400 sq ft	Makes 1.33 gallon
16 FL OZ [(1 PT)]	800 sq ft	Makes 2.6 gallons
32 FL OZ [(1 QT)]	1600 sq ft	Makes [5/ 5.3] gallons
36.8 FL OZ [(1QT 4.8 FL OZ)]	1800 sq ft	Makes 6 gallons
64 FL OZ [(½ GAL/ 2 QT)]	3200 sq ft	Makes [10/ 10.6] gallons

Other Packaging Related Claims:

- [Apply with/ Use in/ Easy to apply with] a Roundup® brand [tank/ Multi Purpose] Sprayer [or a [handheld] trigger sprayer]
- As easy as 1) Open 2) Pour [into measuring [cap/ cup] 3) Mix [with water] 4) Apply
- Built-in Measuring [Cap/ Cup] [and Pour Spout] [Included]
- Cap is a measuring cup
- Cap works as a measuring cup [to help you use the right amount]
- Close tightly while pushing down to turn [Insert Arrow Graphics]
- [Drain back/ Drain-back] [cup/ cap/ spout] [into bottle]
- Drainback bottle design
- Drainback spout helps [prevent/ avoid] [spilling/ messes]
- Easy to measure and pour
- [Easy-Measure/ Easy measure] [cap/ cup]
- [Easy] Pour [cap/ spout]
- Easy pour cap [helps deliver the/ helps measure the] [correct/ desired/ right] amount of product
- Easy pour [cap/ spout] helps to make using concentrates [simple to use/ easy to use]
- For Roundup® Use Only Embossed on Cap
- Includes [built in] Measuring [Cap/ Cup]
- Less mess [with easy pour spout] [with drain back [cap/ cup]
- No need to rinse the [cap/ cup] [- product drains back into the bottle]
- Measuring [Cup /Cap] Included
- Measuring [cap/ cup] makes it easy to use the right amount
- [Measuring/ scale/ volume/ gradation] [lines/ markings/ marks] are inside [of/ the] [easy-measure] cap
- [Peel/ Pull/ Tear/ off/ Remove] [tamper [resistant/ evident] band/ on bottom of cap]
- Pour Spout
- Product drains back into bottle
- Recyclable bottle
- Recycle symbol [Insert graphic]
- Redesigned [drain back/ cap/ spout/ bottle]
- Remove foil seal
- Squeeze Tabs, Turn Cap to Open [Insert graphic with arrows]
- Squeeze, turn, press cap [and turn/ while turning] [to open] [Insert graphic]
- Storage Friendly Design
- Use [the/ easy-measure] cap to measure 6 fl oz per Gallon [of water] [Insert graphics]
- [Use [the] [measuring/ scale/ volume/ gradation] [lines/ markings/ marks] inside [of/ the] [easy-measure] cap]
- With [the convenient] measuring [cup/ cap], mixing [Insert Brand Name] has never been [easier/ this fast and easy]