

7/1995-41

9/17/2008

1/21



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

SEP 17 2008

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Russell Schneider  
Monsanto Company  
800 North Lindbergh Blvd.  
St. Louis, Missouri 63167

SUBJECT: RED Label Amendment  
RD 1645 Herbicide  
EPA Registration No. 71995-41

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable with the following provisions:

1) The text "Prolonged or frequently repeated contact may cause allergic reaction in some individuals" appears twice in the Hazard to Humans and Domestic Animals section. The duplicate text must be deleted.

2) Per the acute toxicity review, the following PPE should be added to the label:

"Handlers must wear long-sleeved shirt and long pants, shoes and socks and chemical-resistant gloves made of any waterproof material."

3) Per the combined 2,4-D and Dicamba RED label table, the first four sentences of Environmental Hazard section must be revised to read:

"This pesticide is toxic to fish and aquatic invertebrates and may adversely affect non-target plants. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when disposing of equipment wash waters or rinsate."

Note: The text "may adversely affect non-target plants," although not required, may be retained as indicated following the text "...aquatic invertebrates."

4) The text appearing on the label "Do not allow people (other than the applicator) or pets on treatment area during application" should be revised to read:

“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.”

5) Per the 2,4-D RED, the following rate restrictions must be added to the label:

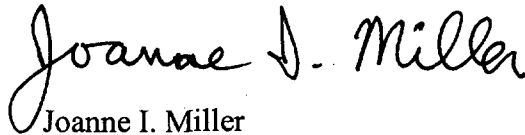
“Limited to 2 broadcast applications per year.  
Maximum of 1.5 lbs ae per acre per application.  
The maximum seasonal rate is 3.0 lbs ae per acre.”

The text currently on the label “1 gallon treats 1200 sq ft” (1.99 lbs ae per acre) exceeds the maximum allowable rate of 1.5 lbs ae per acre per application. The label must be revised.

Please note: Final reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

Submit one (1) copy of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records. Please note that final product reregistration cannot be considered until after all active ingredients in this product are eligible for reregistration.

Sincerely yours,



Joanne I. Miller  
Product Manager (23)  
Herbicide Branch  
Registration Division (7505P)

Enclosure

3/21

[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.]

[FRONT]

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**  
**SEP 17 2008**

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

71995-41

**RD 1645 Herbicide**

**Active Ingredients**

2,4-D, triisopropanolamine salt .....	1.231%
Triclopyr, triethylamine salt .....	0.112%
Dicamba .....	0.080%

**Other Ingredients**..... 98.577%

[The ingredient statement footnote can be located on back panel if insufficient room exists on the front label]

Isomer Specific Method, Equivalent to:

2,4-Dichlorophenoxyacetic acid.....	0.66%, 0.055 lbs./gal.
3,5,6-Trichloro-2-pyridyloxyacetic acid.....	0.08%, 0.007 lbs./gal.
3,6-Dichloro-o-anisic acid.....	0.08%, 0.007 lbs./gal.

[Or alternate statement] This product contains 0.66% 2,4-dichlorophenoxyacetic acid (2,4-D acid equivalent), 0.08% 3,5,6-trichloro-2-pyridyloxyacetic acid (triclopyr acid equivalent), and 0.08% 3,6-dichloro-o-anisic acid (dicamba acid equivalent).

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

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

NET \_\_\_\_

[BACK]

[Optional Text] Open Resealable Label for directions & Precautions  
Press to Reseal

**HOW IT WORKS [OPTIONAL TEXT]]**

[Insert brand name] is a selective (turf) herbicide – it selectively kills broadleaf weeds without harming the desirable turf. It is an effective blend of herbicides designed to kill broadleaf weeds such as dandelion, clover and plantains. (This product works on broadleaf weeds by increasing their growth rate. The new tissues block the nutrient/food transport system (phloem) which starve certain plant structures (roots) resulting in plant death.)

**Product Facts**

Treats up to \_\_\_\_ sq ft [Refer to Appendix 2]  
[Add other product benefit claims from Appendix 1]

**KILLS WEEDS**

[Optional Illustration(s)]

Dandelion, clovers, plantains and over 250 other broadleaf weeds

**WHERE TO USE**

FOR CONTROL OF BROADLEAF WEED ON THE FOLLOWING TYPES OF (RESIDENTIAL) LAWNS  
[Alternate text] FOR (RESIDENTIAL) LAWNS

- (Kentucky) Bluegrass
- Fescue
- Ryegrass (perennial)
- Bermuda grass
- Bahia grass
- Zoysia grass
- Bent grass (excluding golf course fairways, greens and tees)

**IMPORTANT:** Do not use on St. Augustine, Centipede, Carpetgrass or Dichondra, or on lawns where desirable clovers are present.

[Re-entry icon]

- Do not allow people (other than applicator) or pets on treatment area during application.
- Do not allow people ~~and~~ or pets to enter the treated areas until sprays ~~has~~ have dried.



**Questions, Comments or Medical Information**

Call [insert contact #] (Or visit [insert website address])

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.  
(For best results, read the entire label before using this product.)

<p><b>IMPORTANT USE PRECAUTIONS</b></p>	<ul style="list-style-type: none"> <li>◦ Shake well before using.</li> <li>◦ Do not use on St. Augustine, Centipede, Carpetgrass or Dichondra, or on lawns where desirable clovers are present.</li> <li>◦ Do not use this product for controlling weeds in flower or vegetable beds or around shrubs or ornamental plantings.</li> <li>◦ Avoid fine mists.</li> <li>◦ Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees or other desirable plants.</li> <li>◦ Do not spray roots of desirable trees or plants.</li> <li>◦ Do not apply to newly seeded grasses until well established.</li> <li>◦ Do not spray when air temperatures exceed 90 °F</li> <li>◦ Do not pour spray solutions near desirable plants.</li> <li>◦ Do not apply to newly seeded grasses until well established.</li> <li>◦ Do not exceed recommended rates because turf injury may occur.</li> <li>◦ Do not exceed specified rates for any area, be particularly careful within the dripline of tree and other ornamental species.</li> </ul>
<p><b>WHEN TO APPLY (FOR BEST RESULTS) (BEFORE YOU APPLY)</b></p>	<p>For best results</p> <ul style="list-style-type: none"> <li>◦ Avoid applying during excessively hot or dry periods.</li> <li>◦ Avoid applying if rainfall is expected within 24 hours.</li> <li>◦ Do not irrigate (water) lawn for 24 hours after application. If lawn needs watered, water thoroughly before application.</li> <li>◦ Do not mow lawn (turf) 1 to 2 days before application and 1 day after application.</li> <li>◦ Do not reseed treated areas sooner than 3 to 4 weeks after application.</li> <li>◦ Apply when weeds are actively growing. (Use anytime weeds (and) (grasses) are actively growing.)</li> <li>◦ Spray (apply) when air is calm to prevent drift to desirable plants.</li> <li>◦ (RAINPROOF Protection:) Rain or watering 24 hours after application will not wash away effectiveness. [Alternate text] [Insert brand name] is Rainproof in 24 hours</li> <li>◦ [Optional text] For best results apply when weeds are small and actively growing.</li> <li>◦ [Optional text] Some hard-to-kill broadleaf weeds may require a second treatment in 3 to 4 weeks. If so, use as a spot treatment.</li> <li>◦ [Optional text] Weeds usually display (show) visible results within 24 hours (2-4 days) with complete kill in 1 to 2 weeks for annual (most) weeds.</li> </ul>
<p><b>APPLICATION RESTRICTIONS</b></p>	<ul style="list-style-type: none"> <li>◦ Do not apply this product in a way that will contact any person or pet, either directly or through spray drift. <u>Keep people and pets out of the area during application.</u></li> <li>◦ Only the person applying this product may be in the area during application.</li> </ul>

Sprayer-specific assembly/use instructions (see Appendix 2)	Insert instructions from Appendix 3
<b>HOW TO APPLY</b>	<ul style="list-style-type: none"> <li>◦ Adjust spray nozzle coarse spray (setting)</li> <li>◦ Hold applicator end about 6-12" away from the target weed</li> <li>◦ <u>For spot treatment applications, aim at center of weed and spray until thoroughly wet</u></li> <li>◦ For large area treatment, spray evenly over XX sq ft. <i>[When calculating coverage, 1 gallon treats 1200 sq ft]</i></li> </ul>
<b>(HOW TO) REFILL</b> <i>[Optional section]</i>	<p><i>[Optional text]</i> Use <i>[Insert brand name for RD-1644 Herbicide, Reg. No. 71995-42]</i> to refill this container. Follow the instructions below:</p> <p><b>[24 fl oz container]</b>        To empty container add 1.8 oz of <i>[Insert brand name for RD 1644 Herbicide, Reg. No. 71995-42]</i> then fill with water very slowly to avoid foaming.</p> <p><b>[1/2 Gallon]</b>        To empty container add 4.8 fl oz of <i>[Insert brand name for RD 1644 Herbicide, Reg. No. 71995-42]</i> then fill with water very slowly to avoid foaming.</p> <p><b>[Gallon]</b>        To empty container add 9.6 oz of <i>[Insert brand name RD 1644 Herbicide, Reg. No. 71995-42]</i> then fill with water very slowly to avoid foaming.</p> <p><b>[1.33 Gallon PNS]</b>        To empty container add 12.8 fl oz of <i>[Insert brand name for RD 1644 Herbicide, Reg. No. 71995-42.]</i> then fill with water very slowly to avoid foaming.</p> <p><b>[6L (1.58 Gallon)]</b>        To empty container add 15.2 fl oz of <i>[Insert brand name for RD 1644 Herbicide, Reg. No. 71995-42]</i> then fill with water very slowly to avoid foaming.</p> <p><b>[2 Gallon]</b>        To empty container add 19.2 fl oz of <i>[Insert brand name for RD 1644 Herbicide, Reg. No. 71995-42]</i> then fill with water very slowly to avoid foaming.</p>

7/21

Weeds Controlled [Optional Section]			
Alder	Dogfennel	Oxalis	Stinging nettle
Annual yellow sweet clover	Elderberry	Oxeye daisy	Stinkweed
Artichoke	English daisy	Parsley-piert	Stitchwort
Aster	Fall dandelion	Parsnip	Strawberr clover
Austrian fieldcress	False dandelion	Pearlwort	Sumac
Bedstraw	False flax	Pennycress	Sunflower
Beggartick	False sunflower	Pennywort	Sweet clover
Biden	Fiddleneck	Peppergrass	Tall nettle
Bindweed	Field bindweed	Pepperweed	Tall vervain
Bird Vetch	Field pansy	Pigweed	Tansy mustard
Bitterweed	Fleabane, daisy	Pinewoods bedstraw	Tansy ragwort
Bitter wintercress	Flixweed	Plains coreopsis	Tanweed
Black-eyed Susan	Florida betony	Plantain	Tarweed
Black medic	Florida pusley	Poison hemlock	Thistle
Black mustard	Frenchweed	Poison ivy	Tick trefoil
Blackseed plantain	Galinsoga	Poison oak	Toadflax
Blessed thistle	Garlic mustard	Pokeweed	Trailing crownvetch
Blue lettuce	Goathead	Poorjoe	Tumble mustard
Blue vervain	Goatsbeard	Povertyweed	Tumble pigweed
Box elder	Goldenrod	Prairie	Tumbledew
Bracted plantain	Ground ivy	Prickly lettuce	Velvetleaf
Brassbuttons	Gumweed	Prickly sida	Venice mallow
Bristly oxtongue	Hairy bittercress	Primrose	Veronica
Broadleaf dock	Hairy fleabane	Prostrate knotweed	Vervain
Broadleaf plantain	Hawkweed	Prostrate pigweed	Vetch
Broomweed	Healall	Prostrate spurge	Virginia buttonweed
Buckhorn	Heartleaf drymary	Prostrate vervain	Virginia creeper
Buckhorn plantain	Hedge bindweed	Puncture vine	Virginia pepperweed
Bulbous buttercup	Hedge mustard	Purslane	Wavyleaf bullthistle
Bull nettle	Hemp	Ragweed	Western clematis
Bull thistle	Henbit	Red clover	Western salsify
Burdock	Hoary cress	Redroot pigweed	White clover
Burning nettle	Hoary plantain	Red sorrel	White mustard
Bur ragweed	Hoary vervain	Redstem filaree	Wild mustard
Burweed	Honeysuckle	Rough cinquefoil	Wild aster
Buttercup	Hop clover	Rough fleabane	Wild buckwheat
Canada thistle	Horsenettle	Roundleafed marigold	Wild carrot
Carolina geranium	Horsetail	Rush	Wild four-o'clock
Carpetweed	Indiana mallow	Russian pigweed	Wild garlic
Catchweed bedstraw	Ironweed	Russian thistle	Wild geranium
Catsear	Jewelweed	St. Johnswort	Wild lettuce
Catnip	Jimsonweed	Scarlet pimpernel	Wild marigold
Chickweed	Kochia	Scotch thistle	Wild onion
Chicory	Knawel	Sheep sorrel	Wild parsnip
Cinquefoil	Knotweed	Shepherdspurse	Wild radish

8/21

Clover	Lambsquarter	Slender plantain	Wild rape
Cockle	Lespedeza	Smallflower galinsoga	Wild strawberry
Cocklebur	Locoweed	Smartweed	Wild sweet potato
Coffeebean	Lupine	Smooth dock	Wild vetch
Coffeeweed	Mallow	Smooth pigweed	Willow
Common chickweed	Marshelder	Sneezeweed	Witchweed
Common mullein	Matchweed	Southern wild rose	Wooly morninglory
Common sowthistle	Mexicanweed	Sowthistle	Woodsorrel
Corn Chamomile	Milk vetch	Spanishneedle	Wooly croton
Creeping jenny	Milkweed bloodflower	Spatterdock	Wooly plantain
Crimson clover	Mugwort	Speedwell	Wormseed
Croton	Morninglory	Spiny	Yarrow
Cudweed	Mousear chickweed	Spiny Amaranth	Yellow rocket
Curly dock	Musk thistle	Spiny cocklebur	Yellowflower pepperweed
Curly indigo	Mustard	Spotted Catsear	And other broadleaf weeds
Dandelion	Narrowleaf plantain	Spotted knapweed	
Deadnettle	Narrowleaf vetch	Spotted spurge	
Dock	Nettle	Spurge	
Dogbane	Orange hawkweed	Spurweed	

**STORAGE AND DISPOSAL** *[Optional trash can illustration]*

*[All Trigger Sprayers]*

**PESTICIDE STORAGE:** Rotate nozzle to closed position (Turn nozzle to OFF position)(Close nozzle on trigger sprayer). Store in original container in a safe place away from direct sunlight. Keep from freezing.

*[Quick Connect Sprayer]*

**PESTICIDE STORAGE:** Flip down spout to close. NO NEED TO DISCONNECT TRIGGER SPRAYER. Close nozzle on trigger sprayer (Turn nozzle on trigger sprayer to OFF position). Snap sprayer back in place. Store in original container in a safe place away from direct sunlight. Keep from freezing.

*[EZ Sprayer]*

**PESTICIDE STORAGE:**

Release pressure in tank before storing by turning the handle to allow air pressure to escape. DO NOT DISCONNECT SPRAYER HOSE FROM CAP. Retract extendable wand and store in holster *[or Insert storage location]*. Store in original container in a safe place away from direct sunlight. Keep from freezing.



*[Pull 'N Spray-H]*  
**PESTICIDE STORAGE :**  
 Completely dispense product in sprayer prior to storage. Rotate (twist) (sprayer) nozzle to (the) closed (OFF) position. Flip down (color of spout) spout on cap. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Place sprayer back inside *[Insert storage location]* with the nozzle facing down. Store in original container in a safe place away from direct sunlight. Keep from freezing.

*[Battery Operated (Power Sprayer)]*  
**PESTICIDE STORAGE :**  
 Rotate (twist) (sprayer) nozzle to (the) closed (OFF) position. Flip down (color of spout) spout on cap. **NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP.** Place sprayer back inside *[Insert storage location]* with the nozzle facing down. Store in original container in a safe place away from direct sunlight. Keep from freezing.

**DISPOSAL:** Do not reuse this container (except to refill, see **(How To) Refill** section)).  
**If Empty:** Place in trash or offer for recycling if available. **If Party Filled:** Call your local solid waste agency (or 1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS & DOMESTIC ANIMALS**  
**CAUTION:** Causes moderate eye irritation. Harmful if swallowed or absorbed through skin. Prolonged or frequently repeated contact may cause allergic reactions in some individuals. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequent repeated contact may cause allergic reaction in some individuals.

<p><i>[Optional: re-entry statement appears earlier in label]</i>  <i>[Re-entry icon]</i></p>	<p><u>Do not allow People and/or pets may to enter the treated areas until after sprays has have dried.</u></p>
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<b>FIRST AID</b>	
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>◦ Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>◦ Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye.</li> <li>◦ Call a poison control center (insert contact #) or doctor for additional treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>◦ Call a poison control center (insert contact #) or doctor immediately for treatment advice.</li> <li>◦ Have person sip a glass of water if able to swallow.</li> <li>◦ Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>◦ Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>◦ Take off contaminated clothing</li> <li>◦ Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>◦ Call a poison control center (insert contact #) or doctor for additional treatment advice.</li> </ul>
<b>Emergency Medical Information</b>	
<ul style="list-style-type: none"> <li>• Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</li> <li>• You may contact [Insert contact telephone #] for emergency medical treatment information.</li> <li>• This product is identified as [<i>Insert brand name</i>], EPA Reg. No. 71995-41</li> </ul>	

<b>ENVIRONMENTAL HAZARDS</b>
<p>Drift or runoff may adversely affect nontarget plants. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Do not apply this product through any type of irrigation system.</p> <p><u>The 2,4-D component of this product has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination. Application around a cistern or well may result in contamination of drinking water or ground water.</u></p> <p><b>NOTICE:</b> Buyer assumes all responsibility for safety and use not in accordance with directions.</p>

This product is protected by U.S. Patent No. [Insert relevant patent numbers]. (Other patents pending.) No license granted under any non-U.S. patent(s).

© \_\_\_ MONSANTO COMPANY  
 Manufactured for  
 Monsanto Company  
 Lawn & Garden Products  
 800 N. Lindbergh Blvd.  
 St. Louis, MO 63167  
 EPA Reg. No. 71995-41  
 Form No. \_\_\_\_\_ EPA Est. \_\_\_\_\_  
 Superscript is first letter of lot number  
 Made in USA

APPENDIX 1 – Consolidated List of Label Claims

• (Contains) (Now with) FastAct™ (II) (technology) (with foam)
• (See) results in 24 hours (overnight)
• [Insert brand name] Kills the weed you see and the root others leave behind
• Absorbs on contact, starts working immediately
• After [graphic of dead weed]
• Before [graphic of live weed]
• Begins absorbing on contact
• Begins working in hours, New Formula
• Completely kills even the toughest broadleaf weeds
• Contains Fast Act Technology with visible results in 24 hours
• Contains Triclopyr (dicamba) (2,4-D)
• Controls existing weeds, is not a pre-emergent
• Dead Weeds Guaranteed
• Dead Weeds Guaranteed or Your Money Back
• Easy (-ier,)To Use (convenient, handy, useful, well-situated)
• Easy to store
• Easy-to-use applicator
• Economical
• Eliminate weeds – No handling required
• Fast acting formula
• Fast and complete
• Fast and total
• Fast results
• Fast Uptake
• Fast-acting formula absorbs to root more quickly
• For a beautiful weed free lawn
• For Control of Tough Weeds that won't wash away
• Gets to the Root in hours
• Got Tough Broadleaf Weeds in your Lawn - Get [Insert brand name]
• Guaranteed (we guarantee it)
• Guaranteed [results]
• Guaranteed effective: Kills over 250 types of weeds roots and all, with [Insert brand name]
• Guaranteed results (with one application)
• Ideal for killing unwanted broadleaf weeds throughout your yard.
• Improved (faster formula)
• Improved extra strength formula
• Improved for tough weed control
• Improved formula, completely kills even the toughest weeds with just one application
• Increased strength for Intense Weeds
• Kill Tough Weeds Quickly

• Kills (the toughest weeds) the root so weeds (they) don't come back
• Kills (to) the root
• Kills 250+ weeds
• Kills dandelion, clover, chickweed and others
• Kills even tough weeds
• Kills the root so weeds don't come back
• Kills the toughest weeds (always - guaranteed)
• Kills the weed you see and the root you don't
• Kills to the Root (in 24 hours)
• Kills tough broadleaf weeds
• Kills tough weeds – fast
• Kills Tough Weeds (to the Root)
• Kills tough weeds in 2 to 3 weeks
• Kills Ugly, Annoying Weeds in your lawn.
• Kills undesirable weeds in your lawn
• Kills unwanted weeds in your lawn
• Kills weeds - roots and all
• Kills weeds – not lawns
• Kills weeds (clear down to the root) (in) (24 hours) (days) (roots and all)
• Kills weeds clear down to the root, 1 <sup>st</sup> time, every time so weeds don't come back - guaranteed
• Kills weeds dead
• Kills weeds down to the roots
• Kills weeds, roots and all
• Low odor formula
• New (formula)
• Next day (this weekend) results: Begins killing on contact, visible results in 24 hours
• No Root, No Weed, No Problem for your lawn
• No waiting, weeds wilt in days
• Now
• Once it enters the plant, it won't wash off
• One application kills over 250 broadleaf weeds, roots and all (maximum effectiveness)
• Outdoor use only [optional graphic]
• Overnight speed
• Patented FastAct (II) Technology
• Provides maximum control: Kills weeds to the root so they don't ever come back
• Quick and easy to use
• Quick kill formula
• Quick uptake, eliminates weather concerns
• Quick visible results
• Quick-action formula lets you see results
• Rain Proof in 24 hours
• Rainfast
• RainFast (Rainproof) in 24 hours

• Rainproof in 24 hours (for control that won't wash away)
• Ready-To-Use (broadleaf weed killer) (Tough Weedkiller)
• Requires no mixing
• Results in 24 hours
• Results that show
• Satisfaction guaranteed or we will gladly refund purchase price
• Satisfaction guaranteed or your money back with proof of purchase
• Speedy results
• Starts to kill [in] the same day
• Starts to kill in hours
• Starts to kill in/within the same day
• Starts to kill overnight
• Starts working overnight (in hours) (fast)
• Strong (-er) formula
• Stronger Formula. Better Kill! (Complete Kill)
• Systemic weed killer
• The easy way to kill tough (lawn) weeds
• The fast weed killer (starts working immediately)
• Tougher formula (kills to the roots)
• Treats up to 16,000 sq. ft
• Use [product name] to contrl weeds in your lawn.
• Visible results in 24 hours (days)
• Weeds start dying in 1 day
• Won't harm lawns
• Won't wash away (off)
• Works first time, every time (guaranteed)
• Works in 24 hours
• Works on [insert weed list]
• Works only when absorbed by the foliage of weeds
• Works overnight
• Works to the root in hours

*[Promotional options]*

- Save up to \$[x] on (your) next purchase
  - Free weed guide inside
  - Free [ ] with this purchase
  - FREE REFILL
  - FREE SAMPLE
- SAMPLE NOT FOR SALE

### APPENDIX 2 – Packaging Related Claims

NET	24 FL OZ (1PT 8 FL OZ)	30 FL OZ (1 PT 14 OZ)
	64 FL OZ (½ GAL) 1.89 L	128 FL OZ (1 GAL) 3.7 L
	5 L (170 FL OZ) 1.3 GAL	6 L (202 FL OZ) 1.58 GAL
	256 FL OZ (2 GAL) 7.7 L	

[corner flap]

OPEN

Resealable Label for Directions & Precautions

PULL HERE TO OPEN LABEL

PEEL HERE

PEEL OPEN FOR USE DIRECTIONS AND FURTHER INFORMATION

PRESS TO RESEAL

24 oz	Treats up to 60 sq ft
30 oz	Treats up to 75 sq ft
64 oz	Treats up to 150 sq ft
1 gal	Treats up to 300 sq ft
1.33 gal	Treats up to 400 sq ft
1.58 gal	Treats up to 475 sq ft
2 gal	Treats up to 602 sq ft

**Quick-Connect Sprayer (QCS):**

- New
- Now
- Quick connect sprayer
- Quick &(and) easy to use
- No leaks or mess
- Easy to store (see back for instructions)

**Foaming Sprayer (Quick-connect or trigger type):**

- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- Targets exactly (precisely) what (the weeds) you want to spray (kill)
- Accurately targets what (the weeds) you want to spray (kill)
- Accurately targets precisely (exactly) what (the weeds) you want to spray (kill)
- Visible foam shows (targets) (let's you see) exactly (precisely) where (what) (the weeds) you've sprayed
- Visible foam
- Foam
- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- Target only what you want to kill

15/21

- See (shows) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied)
- See (shows) exactly (precisely) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied) (treated)
- See (shows) (marks) area covered (treated) (sprayed).
- (Foam) Marks (shows) treated (sprayed) weeds
- (Foam) Marks (shows) treated (sprayed) weeds for up to 5 minutes
- (Foam) Marks (shows) the weeds you've sprayed (treated)
- (Foam) Marks (shows) the weeds you've sprayed (treated) for up to 5 minutes
- Visible foam marks weeds
- Visible foam marks (shows) weeds you've sprayed (treated)
- Visible foam marks (shows) weeds for up to 5 minutes
- Visible foam marks (shows) weeds you've sprayed (treated) for up to 5 minutes
- Easily (Easy to) see where (the weeds) (what) you've sprayed (treated) (applied)
- Easily (Easy to) see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Foam makes it easy (easier) to see where (the weeds) (what) you've sprayed (treated) (applied)
- Foam makes it easy (easier) to see exactly (precisely) where (the weeds) (what) you've sprayed (treated) (applied)
- Treated (sprayed) weeds stay visible (marked) for up to 5 minutes
- Treated (sprayed) weeds can easily be seen for up to 5 minutes
- Choose foam or clear stream (no foam)
- See where you spray technology
- Marker (Foam) (Foaming) Technology
- Hit (spray) (target) precisely (exactly) what you want
- Foam marks the spot
- Foaming action
- New!
- Now!
- Accurate
- For Visible Results
- See what you've hit
- The more accurate way to spray
- The accurate way to spray
- Hit what you aim at
- Ideal for use in (flower and vegetable) gardens
- VisiSpray (technology)
- VisiMark (technology)
- VisiFoam (technology)
- VisiTech (technology)
- AccuSpray (technology)

- AccuFoam (technology)
- AccuMark (technology)
- WeedMark (technology)

#### **Pull 'N Spray™:**

- 33% more
- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray
- The easier way to spray
- No (More) Hand Fatigue
- No more squeeze, squeeze, squeeze
- No (constant) pumping
- No constant trigger squeezing (pulling)
- No more pumping
- No pumping just pull (and spray)
- No pumping. Just Pull N' Spray (brand)
- (33%) More than 1 gallon size
- Precise control for maximum accuracy
- Refillable
- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Quickly covers large areas
- No more tired (aching) hands
- Fast and easy application
- Easy to use tank sprayer
- Revolutionary (new) applicator
- Change the way you spray
- Ideal for large or small jobs (areas)
- Great for large or small jobs (areas)
- Precise control – sprays (targets) only what you want
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- You're always ready to spray
- It's always ready to spray
- The easier way to kill weeds
- Targets weeds in tight places
- Save (Saves) time and energy
- One pull = (equals) 34 trigger sprays
- One pull delivers 34 trigger sprays
- New!
- Now!
- Improved Applicator (Application)!
- Improved Applicator (Application) System!



- Improved Applicator (Application) Device!
- New and Improved!
- Improved!
- PNS (PNS II)
- Pull 'N Spray (~~Pull 'N Spray II~~)
- Give your hands a break
- Continuous spray
- Targeted spray
- Accurate
- Targets weeds
- Convenient

**EZ Sprayer:**

- (33%) More than 1 gallon size
- 33% more
- Accurate
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Change the way you spray
- Consistent spray for maximum accuracy
- Continuous spray
- Continuous, adjustable spray
- Convenient
- Easy to use tank sprayer
- EASY-TO-USE
- Fast and easy application
- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- New and Improved!
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No more pumping, no more pulling, just spray
- No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- One pump = (equals) X trigger sprays
- One pump delivers X trigger sprays

- Precise control – sprays (targets) only what you want
- Precise control for maximum accuracy
- Quick & Easy to Use
- Quickly covers large areas
- Revolutionary (new) applicator
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- Targets weeds in tight places
- The easier way to kill weeds
- The easier way to spray
- The easy way to spray
- You're always ready to spray

**Battery Operated Trigger Sprayer (Power Sprayer):**

- (33%) More than 1 gallon size
- Accurate
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Batteries included
- Battery Operated
- Change the way you spray
- Consistent spray for maximum accuracy
- Continuous spray
- Continuous, adjustable spray
- Convenient
- Easy to use tank sprayer
- EASY-TO-USE
- Fast and easy application
- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- New and Improved!
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No more pumping, no more pulling, just spray
- No more squeeze, squeeze, squeeze

19/21

- No more tired (aching) hands
- Now!
- Power Sprayer (for large areas)
- Precise control – sprays (targets) only what you want
- Precise control for maximum accuracy
- Quick & Easy to Use
- Quickly covers large areas
- Revolutionary (new) applicator
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- Targets weeds in tight places
- The easier way to kill weeds
- The easier way to spray
- 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 DEVICE [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 DEVICE [illustrations]

[Applicator Device Directions]

##### Illustration # 1

- Remove sprayer from [Insert location] and unwrap hose completely.
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks.
- Flip up spout.

##### Illustration #2

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at bottom of sprayer handle until it stops (and hold for 2 seconds) to ready (prime) the sprayer.

##### Illustration #3

- Adjust (twist) nozzle (at the end of sprayer) to (the) desired spray setting (to 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 (prime sprayer and) continue spraying.

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

#### EZ SPRAYER DEVICE [illustrations]

##### Illustration # 1

- Unwind hose and remove extendable sprayer wand from built-in holster.
  - Attach (insert color) connector to outlet fitting on cap until it clicks firmly into place.
- Note:** Once connected, the (insert color) hose-end connector cannot be removed.

##### Illustration # 2

- Pointing wand tip away from face, extend wand until it clicks into its fully extended position. When fully extended, the trigger will be operational.
- Note:** The trigger will not operate until the wand is fully extended (to the "USE" position).

##### Illustration #3

- 2/21
- Before spraying, pump the handle 10-20 times. The product is designed so that you cannot accidentally over-pressurize the unit.
  - To begin spraying, depress (press down) the (insert color) (thumb) button on the wand.
  - To adjust spray pattern, twist nozzle at the end of the wand.
  - *[Optional text]* Pump unit again as needed to continue spraying.

**BATTERY OPERATED SPRAYER DEVICE** *[illustrations]*

Illustration # 1

- Remove sprayer from [insert location] and unwrap hose completely
- *[Optional Text]* Locate battery compartment (on sprayer) *[Insert optional location of battery compartment]*. (With nozzle in OFF position) (remove battery door) (open battery cover by lifting tab)). Install batteries (insert batteries as shown) (remove plastic wrap from each battery (and reinstall)) (remove plastic terminal shield) and close battery compartment door (replace battery cover until it clicks into place).
- Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks. (Attach coupler to the cap).
- *[Optional text]* Flip up spout.
- *[Optional text]* Spout must remain up or applicator will not spray.

Illustration # 2

- Twist (rotate) (adjust) nozzle (at end of sprayer) to (the) desired spray setting (pattern) (foam or spray).  
*[Alternate text]* Twist (turn) (pull out) nozzle at end of sprayer to adjust spray pattern (to coarse spray).

Illustration # 3

- To prime sprayer, position sprayer level with bottle.
- Point sprayer away from body.
- Grasp sprayer by the handle.

Illustration # 4

- Press and hold button on sprayer to begin spraying. (Could (may) take up to 20 seconds to prime the sprayer)
- *[Optional text]* Hold (button) for continuous spray.
- *[Optional text]* When finished, twist (turn) nozzle to OFF (closed) position and flip down (color of spout) spout on cap.