

71995-42

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Dawn Fee-White  
Monsanto Company, Lawn & Garden Products  
1300 Eye St., NW, Suite 450 East  
Washington, D.C. 20005

MAY 29 2009

Subject: 2,4-D RED Label Amendment  
RD 1644 Herbicide  
EPA Reg. No. 71995-42

Dear Ms. Fee-White:

The label referred to above is in compliance with the 2,4-D RED and is acceptable provided that you:

1. Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data.
2. Make the following changes to the product labeling:
  - a. On page 3, revise the statement to read "Do not exceed ~~recommended~~ **specified** rates because turf injury may occur."
  - b. Revise the Container Disposal section as outline in PR Notice 2007-4. Since your label lists both non-refillable and refillable containers, you must include both sets of disposal instructions.
  - c. Revise the Hazards to Humans and Domestic Animals text from "rubber gloves" to "chemical-resistant gloves made of any waterproof material (selection category A)."
  - d. Remove the claim "Now".
  - e. Remove the text "new" from the following claims, as this product is no longer new:
    - "Begins working in hours, ~~New Formula~~"
    - "~~New~~ (formula)"
    - "~~New!~~ Larger size, covers up to..."
    - "New"

Continued on Page 2

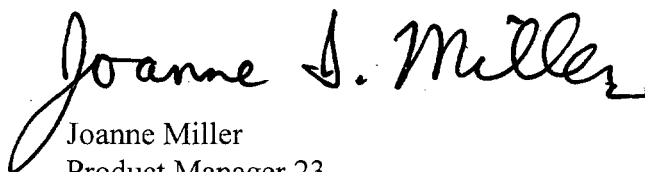
- f. Remove, modify, or submit efficacy studies to substantiate the following claims, as they are overly broad:
  - “~~Completely~~ kills even the toughest broadleaf weeds”
  - “Fast and ~~complete~~”
  - “Fast and ~~total~~”
  - “Guaranteed effective: Kills over 250 types of weeds roots ~~and all~~, with...”
  - “Kills weeds, roots ~~and all~~”
  - “Kills weeds (clear down to the root)...(~~roots and all~~)”
  - “One application kills over 250 broadleaf weeds, roots ~~and all~~ (maximum effectiveness)”
  
- g. Remove the following claims, as they imply heightened efficacy and are false and misleading:
  - “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”
  - “Strong (-er) formula”
  - “Stronger Formula. Better Kill! (Complete Kill)”
  - “Tougher formula (kills to the roots)”

The basic Confidential Statement of Formula (CSF) dated August 31, 2007 is acceptable, and will supercede all previously accepted CSFs.

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

A stamped copy of your labeling is enclosed for your records. You must submit one (1) copy of the final printed label before you release the product for shipment. Products shipped after 12 months from the date of this Letter or the next printing of the label whichever occurs first, must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions

Sincerely,



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

MAY 29 2009

[Editorial Notes: Bracketed text [ ] is for internal use and serves as a 'place holder' for graphics. Parenthetical text ( ) denotes optional wording.]

[Refer to APPENDIX 1 for consolidated list of label claims.]

[Refer to APPENDIX 2 for packaging related claims.]

[FRONT]

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**

**MAY 29 2009**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

71995-42

**RD 1644 Herbicide**

**Active Ingredients**

2,4-D, triisopropanolamine salt .....	16.19%
Triclopyr, triethylamine salt .....	1.51%
Dicamba .....	1.08%

**Other Ingredients**..... 81.22%

[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-D Acid.....	8.68%, 0.765 lbs./gal.
Triclopyr Acid.....	1.08%, 0.095 lbs./gal.
Dicamba Acid.....	1.08%, 0.095 lbs./gal.

[Or alternate statement]

This product contains 8.68% 2,4-D acid equivalent, 1.08% triclopyr acid equivalent and 1.08% 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]

Open Resealable Label for directions & Precautions  
Press to Reseal

<b>HOW IT WORKS</b> <i>[Optional Section]</i>	
[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.)	
<b>Product Facts</b> Treats up to ____ sq ft	
[Insert additional product claims from Appendix 1]	
<b>KILLS WEEDS</b>	<i>[Optional Illustration(s)]</i>  Dandelion, clovers, plantains and over 250 other broadleaf weeds
<b>WHERE TO USE</b>	FOR CONTROL OF BROADLEAF WEEDS ON THE FOLLOWING TYPES OF (RESIDENTIAL) LAWNS <i>[Alternate text]</i> FOR (RESIDENTIAL) LAWNS <ul style="list-style-type: none"> <li>• (Kentucky) Bluegrass</li> <li>• Fescue</li> <li>• Ryegrass (perennial)</li> <li>• Bermuda grass</li> <li>• Bahia grass</li> <li>• Zoysia grass</li> <li>• Bent grass (excluding golf course fairways, greens and tees)</li> </ul> <p><b>IMPORTANT:</b> Do not use on St. Augustine, Centipede, Carpetgrass or Dichondra, or on lawns where desirable clovers are present.</p>
<i>[Re-entry icon]</i>	<ul style="list-style-type: none"> <li>• Do not allow people (other than applicator) or pets on treatment area during application.</li> <li>• Do not allow people <del>and</del> <u>or</u> pets to enter <u>the</u> treated areas until sprays <del>has</del> <u>have</u> dried.</li> </ul>
	<b>Questions, Comments or Medical Information</b> Call <i>[insert contact #]</i> (Or visit <i>[insert website address]</i> )

<b>DIRECTIONS FOR USE</b>	
<p>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>	
<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. Use a coarse spray setting.</li> <li>• Avoid drift of spray mist onto vegetables, flowers, ornamental plants, shrubs, trees or other desirable plants.</li> <li>• Avoid contact with exposed feeder roots of ornamentals and trees.</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 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)</b>  <b>(BEFORE YOU APPLY)</b></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. 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>• <i>[Optional text]</i> Adding oil, wetting agent, or other surfactant to the spray solution may be used to increase effectiveness on weeds but doing so may result in turf injury.</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.  <i>[Alternate text]</i> <i>[Insert brand name]</i> is Rainproof in 24 hours</li> <li>• <i>[Optional text]</i> For best results apply when weeds are small and actively growing.</li> <li>• 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>• <i>[Optional text]</i> Weeds usually 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>• The maximum number of broadcast applications per treatment site is 2 per year.</li> <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 the area during application.</li> </ul>
<p><b>HOW TO USE</b></p> <p><i>[For non-Ready-To-Spray containers]</i></p>	<ul style="list-style-type: none"> <li>• Shake well before using</li> <li>• Measure the area to be treated</li> <li>• Determine amount of product to use based on grass type, size of area to be treated and type of sprayer used.</li> </ul> <p><b><u>DIRECTIONS FOR TANK/PUMP UP SPRAYERS</u></b></p> <p><b>Northern Grasses</b> (Fescues, Kentucky Bluegrass, Perennial Ryegrass &amp; Zoysiagrass):</p> <p>Use 1.5 fl oz per 1 gallon of water for each 500 sq ft (3.0 fl oz per 1 gallon of water for each 1000 sq ft)</p> <p><b>Southern Grasses</b> (Bermudagrass, Bahiagrass &amp; Bentgrass) :</p> <p>Use 1.0 fl oz per 1 gallon of water for each 500 sq ft (2.0 fl oz per 1 gallon of water for each 1000 sq ft )</p> <p><i>[Optional Text]</i> Note: some hybrid bermudagrasses may be sensitive to this product. Contact your local extension service specialist.</p> <p><b><u>DIRECTIONS FOR HOSE-END SPRAYERS</u></b></p> <p><b>Northern Grasses</b> (Fescues, Kentucky Bluegrass, Perennial Ryegrass &amp; Zoysiagrass) :</p> <ul style="list-style-type: none"> <li>• To sprayer jar add 3 fl oz for each 1000 sq ft. DO NOT ADD WATER.</li> <li>• <i>[Optional text]</i> Set dial to __ oz.</li> <li>• Apply evenly over measured area.</li> <li>• After spraying unused product can be poured back into its original container.</li> </ul> <p><b>Southern Grasses</b> (Bermudagrass, Bahiagrass &amp; Bentgrass) :</p> <ul style="list-style-type: none"> <li>• To sprayer jar add 2 fl oz for each 1000sq ft. DO NOT add water.</li> <li>• <i>[Optional text]</i> Set dial to __ oz.</li> <li>• Apply evenly over measured area.</li> <li>• After spraying unused product can be poured back into its original container.</li> </ul>

<p><b>HOW TO USE</b> [32 fl oz Ready-To-Spray container]</p>	<ol style="list-style-type: none"> <li>1. Measure the area to be treated and determine amount of product to use based on grass type, size of area to be treated and type of sprayer used.</li> <li>2. Shake the container well before using</li> <li>3. Connect sprayer to garden hose. Make sure the nozzle is in the off position.</li> <li>4. Turn on the water at faucet. Extend the hose to the farthest area of the lawn to be sprayed. Work back towards the faucet in order to minimize contact with the sprayed area.</li> <li>5. To begin spraying, point the nozzle in the direction you want to spray.</li> <li>6. Bend the small plastic tab back and rotate the dial to the ON position.</li> <li>7. Spray evenly over the measured area.</li> <li>8. To STOP, pull the plastic tab back and rotate the dial counterclockwise to the OFF position.</li> <li>9. Turn the water OFF. To relieve pressure before removing nozzle from the hose, bend the tab back and turn the dial to the ON position until water stops spraying.</li> <li>10. Disconnect sprayer from hose.</li> <li>11. To store unused product, place the dial in the off position.</li> </ol> <p><b>Northern Grasses</b> (Fescues, Kentucky Bluegrass, Perennial Ryegrass &amp; Zoysiagrass):</p> <ul style="list-style-type: none"> <li>• 8 fl oz (1/4 bottle) treats 2500 sq ft</li> </ul> <p><b>Southern Grasses</b> (Bermudagrass, Bahiagrass &amp; Bentgrass) :</p> <ul style="list-style-type: none"> <li>• 8 fl oz (1/4 bottle) treats 4000 sq ft</li> </ul> <p>[Optional Text] Note: some hybrid bermudagrasses may be sensitive to this product. Contact your local extension service specialist.</p>
<p><b>HOW TO CLEAN SPRAYER</b></p>	<p>Clean and rinse spray equipment using soap or detergent and water, and rinse thoroughly before reuse.</p>

<p><b>(HOW TO) REFILL</b> [Optional section]</p>	<p>This product may be used to refill <i>[Insert brand name for RD-1645 Herbicide, Reg. No. 71995-42]</i> containers. 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>[½ 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>
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Weeds Controlled [Optional Section]			
Alder	Dandelion	Marigold, Wild	Rose, Southern Wild
Artichoke	Dandelion, Fall	Marshelder	Rush
Aster	Dandelion, False	Matchweed	Salsify, Western
Aster, Wild	Dock	Medic, Black	Shepardspurse
Bedstraw	Dock, Broadleaf	Mexicanweed	Smartweed
Bedstraw, Pineywoods	Dock, Curly	Morninglory	Sneezeweed
Beggartick	Dock, Smooth	Morninglory, Woolly	Sorrel, Red
Betony, Florida	Dogbane	Mugwort	Sorrel, Sheep
Biden	Dogfennel	Mullein, Common	Sowthistle
Bindweed	Elderberry	Mustard	Sowthistle, Common
Bindweed, Field	Fiddleneck	Mustard, Black	Spanishneedle
Bindweed, Hedge	Fieldcress, Austrian	Mustard, Garlic	Spatterdock
Bitter wintercress	Filaree, Redstem	Mustard, Hedge	Speedwell
Bittercress, Hairy	Flax, False	Mustard, Tansy	Spiny
Bitterweed	Fleabane (daisy)	Mustard, Tumble	Spiny Amaranth
Black-eyed Susan	Fleabane, Hairy	Mustard, White	Spurge
Bloodflower, Milkweed	Fleabane, Rough	Mustard, Wild	Spurge, Prostrate
Boxelder	Flixweed	Nettle	Spurge, Spoted
Brassbuttons	Florida pusley	Nettle, Bull	Spurweed
Bristly Oxtongue	Four-O'-Clock, Wild	Nettle, Burning	St. Johnswort
Broomweed	Frenchweed	Nettle, Dead	Stinkweed
Buckhorn	Galinsoga	Nettle, Stinging	Stitchwort
Buckwheat, Wild	Galinsoga, Smallflower	Nettle, Tall	Strawberry, Wild
Bur ragweed	Garlic, Wild	Oak, Poison	Sumac
Burdock	Geranium, Carolina	Onion, Wild	Sunflower
Burweed	Geranium, Wild	Oxalis	Sunflower, False
Buttercup	Goathead	Pansy, Field	Sweet Potato, Wild
Buttercup, Bulbous	Goatsbeard	Plantain, Blackseed	Tansy Ragwort
Carpetweed	Goldenrod	Parsley-piert	Tanweed
Carrot, Wild	Ground-ivy	Parsnip	Tarweed
Catchweed Bedstraw	Groundsel	Parsnip, Wild	Thistle
Catnip	Gumweed	Pearlwort	Thistle, Blessed
Catsear	Hawkweed	Pennycress	Thistle, Bull
Catsear, Spotted	Hawkweed, Orange	Pennywort	Thistle, Canada
Chamomile, Corn	Healall	Peppergrass	Thistle, Musk
Chickweed	Heartleaf drymary	Pepperweed	Thistle, Russian
Chickweed, Common	Heathaster	Pepperweed, Virginia	Thistle, Scotch
Chickweed, Mousear	Hemlock, Poison	Pigweed	Toadflax
Chickory	Hemp	Pigweed, Prostrate	Trailing Crownvetch
Cinquefoil	Henbit	Pigweed, Redroot	Trefoil, Tick
Cinquefoil, rough	Hoary cress	Pigweed, Russian	Tumbleweed
Clematis, Western	Honeysuckle	Pigweed, Smooth	Velvetleaf
Clover	Hornenettle	Pigweed, Tumble	Veronica
Clover, Annual Yellow	Horsetail	Scarlet Pimpernel	Vervain
Clover, Sweet	Ironweed	Plantain	Vervain, Blue
Clover, Crimson	Ivy, Poison	Plantain, Blackseed	Vervain, Hoary

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Clover, Hop	Jewelweed	Plantain, Bracted	Vervain, Prostrate
Clover, Red	Jimsonweed	Plantain, Broadleaf	Vervain, Tall
Clover, Strawberry	Knapweed, Spotted	Plantain, Buckhorn	Vetch
Clover, Sweet	Knawel	Plantain, Hoary	Vetch, Bird
Clover, White	Knotweed	Plantain, Narrowleaf	Vetch, Milk
Cockle	Knotweed, Prostrate	Plantain, Slender	Vetch, Narrowleaf
Cocklebur	Kochia	Plantain, Woolly	Vetch, Wild
Cocklebur, spiny	Lambsquarter	Pokeweed	Virginia Buttonweed
Coffebean	Lespedeza	Poorjoe	Virginia Creeper
Coffeeweed	Lettuce, Blue	Povertyweed	Wavyleaf Bullthistle
Coreopsis, Plains	Lettuce, Prickly	Prairie	Willow
Creeping jenny	Lettuce, Wild	Prickly Sida	Witchweed
Croton	Locoweed	Primrose	Woodsorrel
Croton, Woolly	Lupine	Puncture vine	Wormseed
Cudweed	Mallow	Purslane	Yarrow
Curly indigo	Mallow, Indiana	Radish, Wild	Yellow rocket
Daisy, English	Mallow, Venice	Ragweed	Yellowflower, Pepperweed
Daisy, Oxeye	Marigold, Roundleafed	Rape, Wild	And other broadleaf weeds

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

**PESTICIDE STORAGE:** Store in original container in a safe place away from direct sunlight.

**DISPOSAL:** Do not reuse this container. **If Empty:** Place in trash or offer for recycling if available. **If Partly 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. Wear long-sleeve shirt and long pants, socks, shoes, and rubber gloves. 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.

<p><i>[Optional: re-entry statement appears earlier in label]</i></p> <p><i>[Re-entry icon]</i></p>	<p>Do not allow <u>people and or pets</u> <del>may to enter</del> <u>the treated areas</u> <del>after</del> <u>until sprays 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 [<b><i>Insert brand name</i></b>], EPA Reg. No. 71995-42</li> </ul>	

<b>ENVIRONMENTAL HAZARDS</b>
<p><u>This pesticide is toxic to fish and aquatic invertebrates. Drift or runoff 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 except as noted on appropriate labels. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Do not contaminate water when cleaning equipment or disposing of equipment wash waters. Do not apply this product through any type of irrigation system.</u></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. 71995-42  
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)
• [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 to store
• 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
• Makes up to XX gallons of spray
• 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 (rainproof)
• RainFast (rainproof) in 24 hours - enters the plant on contact

• Rainproof in 24 hours (for control that won't wash away)
• 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
• See results in 24 hours (overnight)
• 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 XX sq. ft
• Use [product name] to control 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 xx fl oz (qt or gal) (xx mL or L)
- 6 fl oz (177 mL)
- 13 oz (384 mL)
- 16 fl oz (1 pt) (473 mL)
- 32 fl oz (1 qt) 946 mL)
- 64 fl oz (1/2 gal) (1.89 L)
- 128 fl oz (1 gal) (3.79 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

*[Net contents]* Makes up to 'X' gallons

Mix with water to make 'X' gallons of spray solution

Treats (covers) up to 'Y' sq ft

Mix with water to treat (cover) up to 'Y' sq ft

*[ X = net contents ÷ 2 ]*

*[ Y = X \* 1000 ]*

*[Pint]*

Makes up to 8 gallons

Mix with water to make 8 gallons of spray solution

Covers up to 8,000 sq ft

Mix with water to cover up to 8,000 sq ft

*[Quart]*

Makes up to 16 gallons

Mix with water to make 16 gallons of spray solution

Covers up to 16,000 sq ft

Mix with water to cover up to 16,000 sq ft

*[Half Gallon]* Makes up to 32 gallons

Mix with water to make 32 gallons of spray solution

Covers up to 32,000 sq ft

Mix with water to cover up to 32,000 sq ft



[Gallon] Makes up to 64 gallons  
Mix with water to make 64 gallons of spray solution  
Covers up to 64,000 sq ft  
Mix with water to cover up to 64,000 sq ft

New! Larger size, covers up to [ 'Y' ] sq ft

*With (the convenient) measuring cup, mixing [Insert Brand Name] (controlling weeds in your yard) has never been easier*

*With (the convenient) measuring cup, controlling weeds in your yard has never been this fast and easy*

**Ready-To-Spray**

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