71995-47

02 28 2012



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

> OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Dawn Fee-White Monsanto Company, Lawn & Garden Products 1300 I (Eye) St., Suite 450 East Washington, DC 20005 FEB 2.8 2012

Subject:

Label Notification; Per PR-Notice 98-10 RD 1653 (aka Roundup Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II) EPA Reg. No. 71995-47 Date Submitted: January 10, 2012 Notification of Device Instruction Clarification per PRN 98-10

Dear Ms. Fee-White,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated January 10, 2012 for the product referenced above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please contact Jasmine Branch at (703) 347-0351 or <u>branch.jasmine@epa.gov</u>.

Sincerely.

Kable Bo Davis Product Manager 25 Herbicide Branch Registration Division (7505P)

Please read instructions on	reverse before complet	ing torm.		For	m Approv	ed. No. 20	70-0060 4	Approval Expires 2-28-95	
€ЕРА	Environme	United S	otection			Regis	tration dment	OPP Identifier Number	
	A	pplicatio	on for P	esticide - S	Sectio	nl			
1. Company/Product Number Monsanto Company I			Charles .	2. EPA Product Manager 3. Proposed			Proposed Classification		
4. Company/Product (Name) RD1653 (aka Roundup Ready-To-Use Extended C Weed & Grass Killer Plus Weed Preventer II)				PM# 25 None Restricted				stricted	
<ul> <li>5. Name and Address of Applicant (Include ZIP Code) Monsanto Company, Lawn &amp; Garden Products 1300 I (Eye) St., N.W., Suite 450 East Washington, DC 20005</li> <li>Check if this is a new address</li> </ul>				6.Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in comparison and property to: EPA Reg. No. Product Name					
		THE R.	Sect	ion – II		cc	cccc	C C	
Amendment – Explain below. Resubmission in response to Agency letter dated Notification – Explain below.				Final printed labels in response to Agency letter dated					
Explanation: Use addition Notification of device identific approved on 10/31/2011. Plea This notification is consistent wi confidential statement of formula that if this notification is not com enforcement action and penalties	ation and marketing cla ase direct emails regard th the provisions of PR N a of this product. I unders sistent with the terms of I	tims that do r ding the fee t lotice 98-10 ar stand that it is PRNotice 98-1	not require su to <u>regulatory</u> . ad EPA regula a violation of 0 and 40 CFF	affairs@monsan affairs@monsan affairs@consan affair	to.com 52.46, and 1 1 to willfu	no other changes h lly make any false	ave been ma statement to	ther text is the same as de to the labeling or the EPA. I further understand	
1. Material This Product Will	Be Packaged In:			C. C. Barres	- Philes B	and the second second second second	St. 1887		
Child-Resistant Packaging Yes* No * Certification must be submitted	Yes No			Yes     If "Yes"       No       If "Yes"       No. per       Package wgt.			of Container letal lastic Blass aper other (Specify)		
			Letail Container       5. Location of Label Dire         s sizes from 24 oz to1.5 gal       On Label         On Labeling       On Labeling			abel Directio			
6. Manner in Which Label is Affixed to Product			raph Other glued						
State States of the	a sind a sta		Secti	on – IV			20236		
1. Contact Point (Complete items directly below for identification of Name Dan Jenkins			U.S. Agency Regulatory Affairs Manager Code)			n.) le No. (Include Area 202-383-2851			
I certify that the statemer I acknowledge that any k both under applicable law	nowingly false or misle	form and all	ent may be j					6. Date Application Received (Stamped)	
2. Signature Dawn Jecentratio			3. Title Registration Manager						
4. Typed Name Dawn Fee-White 314-694-6576 EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.			5. Date 10 January 2012 White - EPA File Copy (original) Yellow - A				Applicant Copy		
						in the second seco			

January 10, 2012

Dawn Fee-white Regulatory Affairs Manager 314-694-6576

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

Attention: Mr. Kable Davis, Team Lead 25

Subject: Notification of Device Instruction Clarification per PR Notice 98-10 On Master Label for EPA Reg. No. 71995-47

Dear Mr. Davis:

On October 31, 2011, the EPA approved a master label for RD 1653 Herbicide with an alternate brand name of Roundup Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II on EPA Reg. No. 71995-47. Monsanto Company Lawn & Garden Products (Monsanto) is now notifying the Agency of a Device Name for the newly designed Pump 'N Go® Sprayer, a battery-powered sprayer and additional marketing claims.

The Active Ingredient (AI) statement historically has been carried out 3 decimal places for all components. This is inconsistent with the CSF and the production specification. The method to assay the glyphosate and pelargonic acid components are only carried out 2 decimals. For the imazapic, since there is less than 1% in the product, the assay is carried out 3 decimals. The AI statement has been changed on this master label to reflect the same percentages as the CSF. Additional minor changes have been made for legibility or clarity and to match statements that were previously notified on final printed labeling are now incorporated into the master. No change has affected the meaning of any previous statements or affect regulated text.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PRNotice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

This submission is classified as part of the Agency's Fast-Track Program therefore no fee is due. The following documents are included in this submission:

Application for Pesticide form 8570-1 Master label 071995-00033.20120109.Notif.pdf

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

Sincerely,

Dawn Jew Tito

Dawn Fee-White Regulatory Affairs Manager Cc: Daniel J. Jenkins / DC office File

MONSANTO COMPANY 1300 I (Eye) Street, NW Suite 450 East Washington, D.C. 20005 Phone: (202) 383-2866 Fax: (202 789-1748 http://www.monsanto.com

[Editorial Notes: Bracketed text [] is for internal use or 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 assembly and use instructions.]

## **RD 1653 Herbicide**

[Alternate Brand names]

icceir Roundup Ready-To-Use Extended Control Roundup Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II

# Keep Out Of Reach Of Children CAUTION

See back (panel) (label booklet) for additional precautionary statements (and directions for use.)-(Read precautions and directions on-in back label.) e e ce

### **Active Ingredients**

Glyphosate, isopropylamine salt	1.000%
Pelargonic acid and related fatty acids	2.000%
Imazapic, ammonium salt	0.017%
Other Ingredients	96.983%

### NET [\_\_\_] (GAL) (FL OZ)

Ppn Spec # 2D Code

# NOTIFICATION FEB 2 8 2012

[Lot number will be ink jet onto bottle]

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### [Back Label Cover]

Open<u>/Abra</u> (booklet for details) Resealable Label for Directions and Precautions Press to Reseal

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

The Fast & Easy Way to Kill and Prevent Weeds for up to 4 Months! Pump N Go® (2)(II) sSprayer provides up to [insert #] minutes of continuous spray! Extendable wand provides greater accuracy without bending over!

(Insert Generic Logo)

**Did You Know?** [Insert product claim from Appendix 1]

[OPTIONAL BACK COVER SECTION] (HOW IT WORKS)

Dual Action Formula Works 2 (Two) Ways:

IMPORTANT: To prevent new weeds and grasses from growing YOU MUST SPRAY THE ENTIRE AREA you want to control (keep free of weeds), NOT JUST the emerged (existing) weeds.

Dual Action Formula Works 2 (Two) Ways:

- 1. Kills existing weeds and (&) grasses, roots and (&) all [Optional graphics]
- Prevents new weeds from growing for up to 4 months by creating an invisible barrier (in the soil)

[Optional graphics]

### WHERE (AND HOW) TO USE

Apply (spray) this product [Insert brand name] (to) both existing weeds **and** weed-prone areas where weeds have not yet appeared.

[Optional illustrations of where / how to use]:

[Optional text] (Insert color) color represents area to be sprayed to receive 4 month weed-free control.

[Optional graphics of treatment sites]

- Driveway(s) (,walkways,) and (&) sidewalk(s) (cracks)
- Tree rings (Around trees) and mulched areas
- Patios and paths
- Gravel areas
- Along fence lines

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[Optional text] Note: Product goes on clear and will not stain. (Insert color) (highlight) polote shown for illustration purposes only.

### WHAT TO KNOW

Rainproof in 10 minutes Visible Results in 3 hours Plant 4 Months After Application (see booklet for details) Covers Up To [insert #] Sq. Ft. [Calculate, 1 gal covers 400 sq ft)

### WHERE NOT TO USE (DO NOT USE)

In areas that will be planted or seeded within 4 months-<u>OR</u> Around un-established plants, shrubs or trees (see inside booklet for detilas

[Optional text] See inside booklet for details

Phone/computer icon

Questions, Comments or Information call [insert contact telephone number] Visit us on the web at www.roundup.com

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

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

### ©(date) MONSANTO COMPANY

Produced for Monsanto Company Lawn & Garden Products P.O. Box 418, Marysville, OH 43041 PPN LB # EPA Reg. No. 71995-47 EPA Est. 239-IA-3<sup>I</sup>; 58996-MO-1<sup>A</sup>; 239-MS-001<sup>M</sup> (insert additional establishments as needed) Superscript is first letter of lot number Made in USA 2D code UPC

EPA Master Label Notification submitted 1/10/2012 cecie

### [Inside Back Booklet]

(Optional section) **Product Facts:** Container treats more than [] weeds [when calculating number of weeds, 24 flog treats 200 weeds]

### WHAT IT DOES

[Optional weed illustrations] Kills and prevents all types of weeds and grasses

### **HOW IT WORKS**

IMPORTANT: To prevent new weeds and grasses from growing YOU MUST SPRAY THE ENTIRE AREA you want to control (keep free of weeds), NOT JUST the emerged (existing) weeds.

#### [Insert brand name] This product Works 2 (Two) ways:

1. Glyphosate, the primary active ingredient in (this product) [Insert Brand Name] is absorbed by the (weed) leaves. It moves through the weed to the root, stopping the function of an essential enzyme found in plants (but not humans or animals). Weeds die, roots and all - so weeds (they) don't grow back. Kills only what you spray. Any product not absorbed by the plant breaks down without moving in or on the soil to untreated plants. Weeds begin to yellow and wilt within hours (# hours) with complete kill in 1 to 2 weeks.

2. The other ingredient (Contains a second active ingredient that) provides (creates) an invisible barrier in the soil that prevents growth of (new) (sprouting) weed(s) (seeds) (and grasses) (from sprouting, appearing, growing) for up to 4 months.

### [Optional graphics]

### WHERE (HOW) TO USE

Apply (spray) this product [Insert brand name] (to) BOTH existing weeds and (weed-prone) areas where weeds have not yet appeared. (Keeps treated (insert color) areas weed free for up to 4 months.)

- On cracks and crevices in driveways, sidewalks walkways, patios, and tennis courts
- Along fences, foundations, curbs, retaining walls, and edge of lawns
- Around the base or in mulched beds of well-established (at least 6 months old) (ornamental) plants, shrubs or trees
- On gravel areas (gravel pathways)
- On walkways, driveways, (RV and boat) parking areas, and brick patios
- Decorative rock (mulch) or bark landscapes

### WHERE NOT TO USE

- DO NOT SPRAY desirable plants or grasses, they will die.
- DO NOT USE in lawns or for lawn renovation as this product [Insert brand name] prevents desirable grasses from growing too.
- DO NOT USE for vegetable garden preparation or in and around fruits and vegetables.

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 DO NOT SPRAY around young plants or in an area that will be planted or seeded within 4 months.

**Note**: For weed control in these areas use Roundup Weed & Grass Killer Ready-To-Use Plus (or insert brand name for EPA Reg. No. 71995-33) or Roundup Weed & Grass Killer Super Concentrate (or insert brand name for EPA Reg. No. 71995-25).

### [Re-entry Icon]

People and pets may enter treated area after spray has dried.

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### HOW TO ASSEMBLE AND USE

[INSERT SPRAYER SPECIFIC ASSEMBLY/USE INSTRUCTIONS FROM APPENDIX 3]

### HOW TO APPLY

[Optional text for Pull 'N Spray, Battery Operated Sprayer, and Pump N Go and EZ Sprayer Devices]

• Follow illustrations and instructions [Insert location of instructions /illustrations] in the How to Assemble and Use section to ready (prime) the sprayer.

### [Non-foaming Sprayers]

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

[For trigger sprayers only]

- Adjust nozzle to the desired spray setting (foam or <u>spray</u>) [Alternate Text] Adjust nozzle to coarse spray.
- [Optional for PNG, PNS and Battery Wand Point sprayer at unwanted weeds, grasses and weed-prone areas where weeds typically emerge and press sprayer trigger, hold for continuous spray.]
- Spray the existing weeds AND the entire surrounding weed-prone area you want to keep free
  of weeds (weed free) for up to 4 months. Spray the area until THOROUGHLY WET (or
  covered with foam).
- When spraying around the base of **well-established** (at least 6 months old) ornamental plants, shrubs or trees, shield desirable plants from drift with a sheet of cardboard or plastic. If a desirable plant is accidentally sprayed, rinse off immediately with water.

[Optional text] When making applications around desirable trees or ornamental plants, wait until desirable plants have become well established (at least 6 months old) and deeply rooted.

### [Refill Container only]

 Use this product to refill the empty Roundup Weed & Grass Killer Ready-To-Use Plus-(Pump 'N Go Sprayer) Ready-To-Use Extended Control Weed & Grass Killer Plus Weed Preventer II [or insert brand name for EPA Reg. No. 71995-47] container (Pump 'N Go

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(2) Sprayer) by pouring product carefully and directly into the container. DO NOT add water.

### WHEN TO APPLY

### [Insert optional tree icon]

- Spray (apply) when air is calm to prevent drift to desirable plants.
- For (fastest visual) (best) results, apply during warm, sunny weather (above 60 °F) (to accelerate systemic movement from foliage to root). [Optional text However, effective results can be obtained when applications are made under cool and cloudy conditions as low as 50° F.]
- (RAINPROOF (PROTECTION): Rain or watering 10minutes after application will NOT wash away effectiveness.
- [Optional text] Wait (at least) (1, 2, 3) months before spraying a previously treated area unless new weeds appear, then respray (treated area) as needed.]

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### WHEN TO REPLANT

All ornamental bedding plants (annuals and perennials), trees, shrubs, sod and seed (flowers and grasses) may be planted 4 months after application.

### (HOW TO) REFILL

#### [Alternate Text Ready To Use Refill For All Sizes]

To refill this empty container, pour product carefully and directly from the [insert brand name for ready-to-use product on EPA Reg. No. 71995-47] container designated as the ready-to-use refill container. DO NOT add water.

#### [24 fl oz]

To empty container add 1 oz (2 Tbs) of *[Insert brand name for Reg. No. 71995-40]* then fill with water very slowly to avoid foaming.

#### [30 fl oz]

To empty container add 1.5 oz (3 Tbs) of *[Insert brand name for Reg. No. 71995-40]* then fill with water very slowly to avoid foaming.

#### [1/2 Gallon]

To empty container add 3 fl oz (6 Tbs) of *[Insert brand name for Reg. No. 71995-40]* then fill with water very slowly to avoid foaming.

#### [Gallon]

To empty container add 6 oz of [Insert brand name for Reg. No. 71995-40] then fill with water very slowly to avoid foaming.

### [1.1 Gallon]

To empty container add 7 oz of [Insert brand name for Reg. No. 71995-40] then fill with water very slowly to avoid foaming.

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### [1.25 Gallon]

Use this product to refill the empty Roundup Ready-To-Use Extended Control ® Weed & Grass Killer Plus Weed Preventer II (Pump 'N Go Sprayer) (or insert brand name for 71995-47) container by pouring product carefully and directly into the container. DO NOT add water.

### [1.33 Gallon]

To empty container add 8 fl oz of [Insert brand name for Reg. No. 71995-40] then fill with water very slowly to avoid foaming.

### [1.5 Gallon]

To empty container add 10 fl oz of [Insert brand name for Reg. No. 71995-42] then fill with water very slowly to avoid foaming.

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

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

[Alternate Text] Rinse sprayer and sprayer parts (hose) with water 3 times. Spray rinse water on bare soil or gravel. Discard empty sprayer bottle as instructed in DISPOSAL section.

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

- Connect sprayer head to any Roundup brand product with a quick-connect cap (adaptor) (any Roundup brand product bottle compatible with the battery sprayer). [Insert brand name of sprayer]
- Failure to properly clean sprayer before using with other Roundup brand products may cause damage to your plants.

### KILLS ALL TYPES OF WEEDS & GRASSES [Optional Section]

Bahiagrass Bindweed Bluegrass Bromegrass Chickweed Crabgrass Creeping Beggarweed Diffuse Lovegrass False Dandelion Fiddleneck Garden Spurge Knotweed London Rocket Mayweed

71995-47 Last APPROVED 10/31/2011 Bentgrass Black Medic Brassbuttons Bur Clover Common Plantain Creeping Bentgrass Curly Dock Dog Fennel Fennel Filaree Henbit Lambsquarters Maiden Cane Mouseear Chickweed

EPA Master Label Notification submitted 1/10/2012 Bermudagrass Blue Toadflax Broadleaf Plantain Canada Thistle Common Groundsel Creeping Charlie Dandelion Evening Primrose Fescue Florida Pusley Johnsongrass Little Bitter Cress Mallow Nimblewill

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Oldenlandia Pennsylvania Smartweed Primrose Quackgrass Shepherdspurse Spotted Spurge Tansy Ragwort Whitetop Yellow Nutgrass Orchardgrass Pennywort Prostrate Spurge Ragweed Smooth Cat's Ear St. Augustinegrass Torpedograss Wild Morning Glory Zoysia Oxalis Perennial Ryegrass Puncture Vine Sandspur Sowthistle Tall Fescue White Clover

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[Optional Text] 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** [trash can illustration]

### [Non-sprayer packages]

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

### [Trigger Sprayer]

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

### [Quick Connect Sprayer]

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

### [Pull 'N Spray]

### **PESTICIDE STORAGE :**

Completely dispense product in sprayer prior to storage. Rotate (twist) sprayer nozzle to the (CLOSED or OFF) position. Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back inside carrier on bottle with the nozzle facing down. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

### [Battery Operated Sprayer] PESTICIDE STORAGE :

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

### [Pump N Go(II) Sprayer]

### PESTICIDE STORAGE :

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

[All packaging types]

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

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

[Alternate language for non-sprayer container] 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 toll free number]* for disposal instructions. Never place unused product down any indoor or outdoor drain.

### **PRECAUTIONARY STATEMENTS** [optional illustration]

### HAZARDS TO HUMANS & DOMESTIC ANIMALS

**CAUTION**: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

### **FIRST AID**

IF IN EYES	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> </ul>
	<ul> <li>Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes.</li> </ul>
	<ul> <li>Call a poison control center (insert contact telephone #) or doctor for treatment advice.</li> </ul>

### **EMERGENCY MEDICAL INFORMATION**

- Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
- You may contact (insert contact telephone #) for emergency medical treatment information.
- This product is identified as [Insert brand name], EPA Reg. No. 71995-47

### **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.

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

### Guaranteed Satisfaction.\*

### 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 text] Roundup Family of Products: Visit the Roundup website to learn more about the Roundup family of products for the best solution to your toughest weed problems [Insert optional graphics of products]

### [Optional text]

Roundup Lawn & Garden products have the best solutions to your toughest weed problems. Visit the Roundup website, <u>www.roundup.com</u>, to learn more about the Roundup family of products.

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

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

[Insert relevant trademark statements]

[\_\_] MONSANTO COMPANY
 Produced (Manufactured) for
 Monsanto Company
 Lawn & Garden Products
 PO Box 418
 Marysville, OH 43041-0418
 PPN (Form No.)
 EPA Reg. No. 71995-47
 EPA Reg. No. 71995-47
 EPA Est. 239-IA-3<sup>1</sup>; 58996-MO-1<sup>A</sup>, 239-MS-001<sup>M</sup> (insert additional establishments as needed)
 Superscript is first letter of lot number
 Made in USA

[Base Label]

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

PRECAUTIONAR	Y STATEMENTS [optional illustration]				
CAUTION: Cause	JMANS & DOMESTIC ANIMALS es moderate eye irritation. Avoid contact with eyes or clothing. Wash pap and water after handling.				
FIRST AID	ceite c				
IF IN EYES	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20</li></ul>				
	<ul> <li>Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes.</li> </ul>				
	Call a poison control center (insert contact telephone #) or doctor for treatment advice.				
EMERGENCY ME	EDICAL INFORMATION				
<ul> <li>Have the product going for treatment</li> </ul>	uct container or label with you when calling a poison control center or doctor, or ment.				
You may conta	act (insert contact telephone #) for emergency medical treatment information.				
<ul> <li>This product is</li> </ul>	identified as [Insert brand name], EPA Reg. No. 71995-47				

[Insert container specific storage and disposal]

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

EPA Reg. No. 71995-47 PPN (LB code) EPA Est. 239-IA-3<sup>I</sup>; 58996-MO-1<sup>A</sup>; 239-MS-001<sup>M</sup> (insert additional establishments as needed) Superscript is first letter of lot number Made in USA [Lot number will be ink jet onto bottle]

### APPENDIX 1 – Consolidated List of Label Claims

- Before [weed graphics] / After [weed graphics]
- Begins working in hours
- 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.
- Contains FastAct<sup>™</sup> (Technology)
- Contains Pelargonic (acid)
- Controls tough weeds longer
- Dead in a day
- Dead Weeds Guaranteed [must qualify claim]
- Delivers maximum performance: Kills tough weeds and grasses to the root, prevents new weeds and grasses for up to 4 months, visible results in hours (6 hours), rainproof protection in (10) mintues minutes, great value covers up to [] sq ft.
- Do NOT add water
- Dual (2-way) Action (kills and prevents) Formula Works Two (2) Ways
- Dual (2-way) Action: Kills existing weeds (roots and all) and prevents new weeds from appearing for up to 4 months
- Easy to use (convenient, handy, useful)
- Eliminate(s) weeds
- Even if it rains –this product [Insert Brand Name] won't lose its effectiveness
- Exclusive (Roundup brand) formula
- Extended performance
- Extended weed control
- Fast acting (formula)
- Fast results
- FastAct<sup>™</sup> (Technology)
- Fast-acting formula moves to the root faster (is absorbed fast)(more quickly)
- Glyphosate targets an enzyme found in plants, but not in people or pets
- Great value covers up to [] sq ft
- Guaranteed Satisfaction. (Open booklet for details).
- Ideal for killing and preventing unwanted weeds and grasses throughout your yard. Use along fences, retaining walls; in cracks of walks, drives and patios; and around flower (landscape) beds, rings around trees and shrubs
- Keeps driveways, walkways, landscape borders, tree rings, and other areas weed-free for up to 4 months
- (One application) Kills (existing) weeds (& grasses) (roots & all) and prevents (new) weed(s) (seeds) (from sprouting, appearing, growing) for up to 4 months
- Kills (the toughest weeds and grasses) to the root so weeds (they) don't come back
- Kills (to) the roots
- Kills and prevents for up to 4 months
- Kills more weeds in more places.
- Kills over 100 weeds
- Kills the weeds (& grasses) you see (roots & all) and prevents (new) weed(s) (seeds) (from

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sprouting, appearing) for up to 4 months

- Kills tough weeds & grasses to the root
- Kills weeds dead
- Kills weeds, roots and all
- Long lasting formula
- Next day results: Begins killing on contact, visible results in 6 hours No Hand Fatigue
- No Mix(ing), No Mess
- No Root, No Weed, No Problem
- NOW
- One application kills weeds (to the root) and prevents (new) weeds for up to 4 months
- One (1) application lasts up to 4 months
- One (1) application kills and prevents weeds (and grasses) for months
- One (1) (1-step) step protection
- Patented FastAct (II) Technology
- Pelargonic (acid) makes the difference! (Only Roundup brands have it)
- Plant 4 months after application
- Pour refill (directly) into Pump 'N Go container (sprayer)
- Powered by Pelargonic (Acid)
- Provides extended control of weeds in driveways, walkways, landscape borders, tree rings, and other areas.
- Pump 'N Go Refill
- Quality that lasts
- Rainproof (Protection) in minutes; rainproof in 10 minutes; for control that won't wash away
- Ready-To-Use
- See results in 6 hours (even when it's cool) (even in the Spring)
- Results that show
- Same day results
- Satisfaction guaranteed
- Seasonal weed control
- (See) (visual) results in hours
- Prevents for up to 4 months
- 2 in 1 (kills and prevents)
- Speedy results
- Spray today, dead tomorrow
- Starts to kill in hours (same day)
- Starts to kill overnight
- Starts working in [Insert #] hours
- Starts working overnight
- Stops (prevents) (kills) weeds (and grasses) all season long
- The fast weed killer (starts working immediately)
- The Fast and (&) Easy Way to Kill and (&) Prevent Weeds for Up to 4 Months
- Glyphosate formula targets an enzyme found in plants but not in people or pets
- Tougher than the toughest weeds
- Trusted protection

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- Trusted results for guaranteed satisfaction (Open booklet for details\*) [qualify guarantee]
- Use to trim and edge landscape areas
- Visible Results in hours (6 hours)
- Weeds start dying in 1 day

[Promotional options]

- Save up to \$[x] on (your) next purchase
- Free [insert offering] inside
- Free [insert offering] with this purchase of [Insert brand name] (container size)
- FREE SAMPLE
- SAMPLE NOT FOR SALE
- Value sized [ ]% more (free)
- Refill Size
- Refill
- FREE [Insert Brand Name] a (insert dollar amount) VALUE
- · Can be used to refill the Pump 'N Go Sprayer
- Bonus size
- Great Value
- \$[X] Rebate

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### **APPENDIX 2 – Packaging Related Claims**

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### Quick-Connect Sprayer (QCS)

- 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)

- Visible foam
- Foam
- Foam targets exactly (precisely) what (the weeds) you want to spray (kill)
- See (shows) where (the weeds) (what) (how much) you (you've) spray (sprayed) (applied)
- See (shows) (marks) area covered (treated) (sprayed).
- (Foam) Marks (shows) treated (sprayed) weeds
- (Foam) Marks (shows) the weeds you've sprayed (treated)
- Visible foam marks weeds
- Visible foam marks (shows) weeds you've sprayed (treated)
- Easily (Easy to) see where (the weeds) (what) you've sprayed (treated) (applied)
- Visible foam makes it easy (easier) to see 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)
- Choose foam or clear stream (no foam)
- See where you spray technology
- Marker (Foam) (Foaming) Technology
- Foam marks the spot
- Foaming action
- For Visible Results
- · See what you've hit
- The accurate way to spray
- Hit what you aim at

### **Pull 'N Spray**

- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray
- No (More) Hand Fatigue
- No more squeeze, squeeze, squeeze

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- No (constant) pumping
- No constant trigger squeezing
- No more pumping
- No pumping just pull and spray
- (X%) More than 1 gallon size
- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Quickly covers large areas
- No more tired (aching) hands
- Fast and (&) easy application
- Easy to use tank sprayer
- Change the way you spray
- Great for large or small jobs (areas)
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- You're always ready to spray
- It's always ready to spray
- The easier way to kill (and prevent) weeds
- Save (Saves) time and energy
- One (1) pull = (equals) [ ] trigger sprays
- One (1) pull delivers [ ] trigger sprays
- 1 Pull = (insert #) Trigger Sprays
- Pull 'N Spray
- Give your hands a break
- Continuous spray
- Accurate
- Targets weeds
- Convenient

### Pump N Go Sprayer

- (X%) More than 1 gallon size
- X% 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 (extendable wand)
- Easy to use tank sprayer
- EASY-TO-USE
- Extendable wand provides greater accuracy without bending over
- Fast and (&) easy application

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- Give your hands a break
- Great for large or small jobs (areas)
- Ideal for large or small jobs (areas)
- Improved Applicator (Application) Device!
- Improved Applicator (Application) System!
- Improved Applicator (Application)!
- Improved!
- It's always ready to spray
- Long(-er) spray time with less pumping
- New and Improved!
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No (more) pumping, no (more) pulling, just spray
- No constant trigger squeezing (pulling)
- No more squeeze, squeeze, squeeze
- No more tired (aching) hands
- Now!
- Quick & Easy to Use
- Quickly covers large areas
- Revolutionary (new) applicator
- Refillable
- Save (Saves) time and energy
- Targeted spray
- Targets weeds
- The easier way to kill (and prevent) weeds
- The easier way to spray
- The easy way to spray
- The fast and easy way to kill (and prevent) weeds
- (Provides) Up to [] minutes of continuous spray
- You're always ready to spray
- •

#### Battery Operated Trigger Sprayer

[Optional battery sprayer/device brand name(s) Comfort Wand Continuous Spray Wand]

- X % more
- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray
- The easier way to spray
- No (More) Hand Fatigue

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- No more squeeze, squeeze, squeeze
- No (constant) pumping
- No constant trigger squeezing (pulling)
- No (more) pumping, no (more) pulling, just spray !
- (X %) More than 1 gallon size
- Power sprayer for large areas
- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Quickly covers large areas
- No more tired (aching) hands
- No more trigger sprayer
- 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)
- 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 (and prevent) weeds
- Targets weeds in tight places
- The fast way to spray
- The powerful way to spray
- Save (Saves) time and energy
- New!
- Now!
- Improved Applicator (Application)!
- Improved Applicator (Application) System!
- Improved Applicator (Application) Device!
- New and Improved!
- Improved!
- Give your hands a break
- Continuous spray
- Targeted spray
- Accurate
- Targets weeds
- Convenient
- (New) Continuous Spray Wand
- Control Wand (with extended reach
- Control Wand (with continuous spray)
- (New) Extended Reach Wand
- Extendable spray wand less bending

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• Extendable (insert device name) spray wand

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### **APPENDIX 3 – Packaging Related Instructions**

### QUICK CONNECT SPRAYER [illustrations]

- 1. Remove sprayer. Pull cord/tubing ALL THE WAY OUT.
- 2. Insert (color of plug) plug into spout on cap until it clicks.
- 3. Flip up spout. Open nozzle at end of sprayer. (Select desired nozzle position, Foam (Marker) or Stream (Spray)(No Marker)(No Foam))

# [PULL 'N SPRAY illustrations

[Applicator Device Directions]

### Illustration # 1

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

### Illustration #2

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

### Illustration #3

- Twist nozzle at end of sprayer to adjust spray setting.
- 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)).

### PUMP N' GO (EZ) SPRAYER [illustrations]

CUT [Illustration # 1]

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

### **CONNECT** [Illustration # 2]

2. Unwind hose. Firmly push the connector at the end of the hose onto the spout on the pump, until it locks into place. The white dust cap on spout must first be removed before connecting

### **EXTEND WAND** [Illustration # 3]

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

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### PUMP [Illustration # 4]

4. Make sure handle is screwed on TIGHTLY or the bottle will not pressurize. Pump container 15-20 (PNG2 25-30) times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. Pumping the higher range will provide longer spray duration. After pumping, push pump down and turn handle clockwise to lock into carrying position. (NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.)

### SPRAY [Illustration # 5]

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

### **STORE** [Illustration # 6]

6. When finished spraying, push (press) the yellow button and (retract) push (the) wand back to the original storage position until the yellow button snaps into place. Place wand back onto the top of the bottle in the integrated holster with nozzle tip extended through the eyelet opening.

### **DEPRESSURIZE** [illustration #7]

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

### BATTERY OPERATED SPRAYER DEVICE [illustrations]

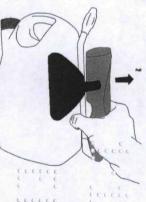
### 1. Remove

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



[Illustration #1] Unsnap holder

Twist left



Pull

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

Remove protective strip from battery compartment to activate batteries.

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[Illustration #2]

### 2. Connect

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



### [Illustration #3]

### 3. Extend

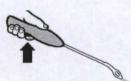
Flip open wand [applicator name] until it clicks and locks into position.



### [Illustration #4]

### 4. Spray

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



[Illustration #5]

### HOW TO APPLY/USE: [icon]

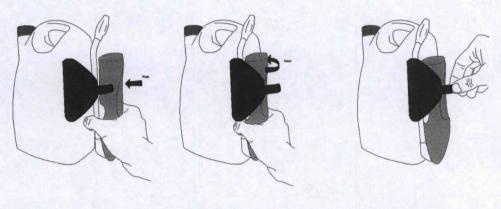
Follow illustrations and instructions above. Twist nozzle at end of wand [applicator name] to desired spray pattern. Point [applicator name] nozzle away from body and hold [color of trigger] trigger for continuous spray. Release trigger to stop spray.

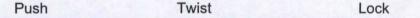
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After Use: Twist nozzle to OFF position. Completely empty sprayer before storing. Engage trigger lock by sliding the switch forward. Flip the wand to [applicator name] closed and store on the side (holder) (clip) (carrier) with the wand up by slightly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





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

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

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

Negative Positive

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

### **IMPORTANT SPRAYER INFORMATION** [Optional Section for Battery Operated Device Only]

- Read and follow all directions before use.
- [Insert sprayer brand name] is to be used only (was developed for use) with [Insert brand name of refill pack or bottle] bottles. [Insert sprayer brand name] may not be compatible with other products

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- Do not drop or throw sprayer.
- Do not submerge (immerse) sprayer in water. Never place sprayer in dishwasher.
- Do not use soap or other cleaning agents to clean sprayer. If necessary, clean outer sprayer surface only with damp towel.
- Insert batteries in their correct (+/-) position. Remove batteries for winter storage or when storing product for long periods of time.
- Always use a complete set of new alkaline batteries. Never mix alkaline, carbon-zinc, or rechargeable batteries.
- Always follow the manufacturer's recommendations for battery disposal and use.
- Purge [Insert sprayer brand name] of liquid for winter storage or place [Insert sprayer brand name] in a heated storage area for winter storage.

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TROUBLESHOOTING SECTION FOR BATTERY-OPERATED SPRAYER [OPTIONAL SECTION]

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

Troubleshooting Tips:

Prot	olem: Sp	prayer does not spray [function].				
		Batteries not installed properly. ee instructions for correct battery placement.				
Prob	olem: Spray out].	er makes a straining noise [Sprayer runs but nothing [r	no product	] comes		
	Possible Cause: Solution:	Nozzle is turned Off. Turn nozzle to [desired] spray setting [position].				
	Possible Cause: Solution:	[Color of plug] plug at end of hose is not flipped up. Insert [color of plug] plug at end of hose into [color of spout] spout on cap <u>until it clicks</u> and flip up spout.				
	Possible Cause: Solution:	Sprayer is not primed. Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime the sprayer.				
Prot	olem: Spray nozzl	y pattern is weak [or uneven] [product flow is uneven of le].	r dribbles	out of		
	Possible Cause: Solution:	Weak batteries. Install a fresh set of alkaline batteries.				
	Possible Cause: Solution:	[Color of plug] plug at end of hose is not flipped up. Insert [color of plug] plug at end of hose into [color of <u>until it clicks. [</u> Attach coupler to the cap] and flip up sp		out on cap		
	Possible Cause: Solution:	Nozzle not fully open. Turn nozzle to [desired] spray setting [position].				

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