

71995-50

05/12/2008

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



OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MAY 12 2008

Ms. Dawn Fee-White
Monsanto Lawn and Garden Products
1300 I (Eye) Street, NW, Suite 450 East
Washington, DC 20005

Dear Ms. Fee-White:

Subject: RD 1689 Herbicide (Revise Master Label)
EPA Registration No. 71995-50
Application Dated March 10, 2008

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable provided you make the following change before you release the product for shipment.

--To fully comply with PR-Notice 2007-4, you must add one of the Nonrefillable Container Statements required by Appendix A of the PR Notice.—

Submit one (1) copy of your final printed labeling incorporating the above change before you release the product for shipment. Amended labeling supersedes all previously approved ones. A stamped copy of labeling is enclosed for your records.

Sincerely,

Viikie K. Walters for
James A. Tompkins
Product Manager 25
Herbicide Branch
Registration Division (7505P)

EPA Reg. No. 71995-50

[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/instructions]

RD 1689 Herbicide

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

MAY 12 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
71995-50

Active Ingredients:

- Glyphosate, isopropylamine salt 18.0%
- Triclopyr, triethylamine salt 2.0%
- Diquat dibromide..... 1.0%
- Other Ingredients 79.0%

Keep Out Of Reach Of Children

CAUTION

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

NET []

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 Approved February 7, 2008
 Resubmitted 3/10/08 at request of EPA

[optional text]

* Open (booklet for details)

Resealable Label for Directions & Precautions

Press to reseal

Product Facts	Makes up to [] gallons Treats up to [] sq ft (approx. size of [] tennis courts) <i>[See Appendix 2 for calculations]</i>
KILLS (WEEDS)	<p><i>[Illustration of grassy, broadleaf and woody weeds]</i></p> <p>KILLS ALL TYPES OF TOUGH WEEDS, GRASSES & Brush including: Woody Brush & Vines, Poison Ivy, Poison Oak, Poison Sumac, Kudzu, Wild Blackberry, Ragweed, Bamboo</p> <p>STUMPS</p> <p><i>[alternate text]</i> Kills Woody Brush & Vines Including:</p> <ul style="list-style-type: none"> • poison oak • poison ivy • wild blackberry • kudzu • bamboo • ragweed • Plus over 100 Unwanted Plants, Weeds & Grasses
WHERE TO USE	<ul style="list-style-type: none"> • On patios, walkways and driveways • In recreational areas, fields & trails (parks, and sports facilities) • Around (homes), buildings, cabins, lodges, and camp sites • Along fences (paths) & foundations • On wooded and vacant lots • Plus other areas where tough weeds are invading your yard • (Dense) fields and trails • Around shrubs & trees • Vines growing up the side of objects including mature trees or fences or low to the ground in a wooded area on yard perimeter * <p>*refer to label booklet for the recommended application to treat climbing vines.</p>
AMOUNT	6 fl oz (12 Tbs) per 1 gallon of water

TO USE

[telephone icon]	Questions, Comments, or (Medical) Information	[computer icon]
	Call [insert contact telephone number]	www.roundup.com
		www.stoppoisonivy.com

This bottle contains an anti-theft device, either inside or on the back of the bottle. It does not affect product performance.

Guaranteed Satisfaction. *Open booklet for details.

DIRECTIONS FOR USE

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

KILLS ALL TYPES OF TOUGH WEEDS, GRASSES & BRUSH

Including: Alder, ash, aspen, blackberry, broom (French, Scotch), buckwheat, ceanothus, chamise, cherry, coyote brush, dewberry, elderberry, elm, eucalyptus, hawthorn, hazel, honeysuckle, kudzu, locust, maple, oak, persimmon, poison oak, poison ivy, poison sumac, poplar, raspberry, sage, sagebrush, salmonberry, sassafras, sumac, sweetgum, thimbleberry, tree tobacco, trumpetcreeper, wild rose (multiflora) and willow.

HOW IT WORKS [optional illustration]

[Insert brand name] enters plants through foliage and moves systemically to the roots, killing weeds by altering the production of certain substances [by stopping the formation of an essential enzyme] found in plants. Weeds usually yellow and wilt within 24 hours (hours) with complete kill in 1 to 2 weeks (for annual weeds). (Perennial weeds such as poison ivy may take 4 or more weeks for complete kill.)

[ALTERNATE TEXT] [Insert Brand Name] is absorbed by the weed leaves. It moves through the weed to the root, altering the production of certain substances found in plants. Weeds die, roots and all - so weeds don't grow back.

Mixing Instructions

[optional sprayer illustration]

Tank Sprayer Use of a Roundup® Brand tank sprayer is recommended. A plastic, aluminum, fiberglass, plastic-lined steel, or stainless steel sprayer may also be used.

- Add 6 fl oz (12 Tbs) to 1 gallon of water.
- Spot treat or spray evenly over 300 sq ft

[OPTIONAL DNS ILLUSTRATION]

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Hose-End Sprayer

(For large areas consider using the Ortho® Dial'n Spray®)

- Set dial to 6 oz.
- To sprayer jar add 6 fl. oz. (12 Tbs) for each 300 sq ft. **DO NOT** add water.
- Spray evenly over measured area.
- After spraying, unused product can be poured back into its original container.

1.33 Gallon Roundup Sprayer

- Add entire contents of the 8 fl oz (16 Tbs) [Insert Brand Name for refill concentrate] to the empty Roundup sprayer and fill with water.

OR

- Add 8 fl oz (16 Tbs) [Insert Brand Name for refill concentrate [EPA Reg.No. 71995-50]] to the empty Roundup sprayer and fill with water.

1 Tablespoon (Tbs) = 3 teaspoon (tsp)

1 fl oz = 2 Tbs

For easy to kill weeds such as seedlings add 3 fl oz (6 Tbs) to 1 gallon of water.

Do not (mix, store or) apply with (in) a galvanized or unlined steel sprayer (except stainless steel); or through any irrigation system (or with sprinkling can).

HOW TO CLEAN SPRAYER

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

HOW TO APPLY [optional illustration]

- Use coarse spray pattern to reduce drift to desirable plants
- Spray the weed or grasses you want to kill until thoroughly wet.
- When spot treating weeds around desirable plants, shield plants from drift with a sheet of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

Important:

- **Do not spray plants or grasses you like - they will die.**
- Not recommended for spot weed control in lawns since glyphosate [alternate Roundup or this product], [the key ingredient in Roundup,] kills lawn grasses.
- Do not use on or around edible food or feed crops.
- **[Advisory statement #1: include if no lawn or plot preparation uses are included in final printed label]** **Note:** Do not use for lawn renovation or (flower bed and vegetable garden preparation (plot preparation); instead use Roundup Concentrate [or Insert brand name for Reg. No. 71995-26 or 71995-29] or Roundup Super Concentrate [or insert brand name for Reg. No. 71995-25].

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APPLICATION RESTRICTIONS

Do not apply this product in a way that will contact any person or pet, either directly or through drift. Only persons applying this product may be in the area during application.

USER SAFETY RECOMMENDATIONS

Clothing and protective equipment exposed to this product should be washed in detergent and hot water. Such items should be kept and washed separately from other laundry.

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

WHEN TO APPLY [optional illustration]

- Apply when weeds are actively growing.
- For best results, apply during warm, sunny weather (above 60° F) (to accelerate systemic movement from foliage to roots.)
- Apply when air is calm to prevent drift to desirable plants.
- (RAINPROOF (Protection)): - Rain or watering (less than) (10, 30, 45, 60, or 90 minutes; 1 hour; 2 hours) after application will NOT wash away effectiveness.
- [optional text] Apply when weeds are small and before seeds form.
- [optional text] (Some) (well) Established (hard to kill) (perennial) weeds may require a repeat application.
- [optional text] Note: Brush (sprayed in the Fall) may not be controlled until the following season. In the Spring spray regrowth if it occurs.
- [optional text] Weeds usually yellow and wilt within 24 hours (hours) with complete kill in 1 to 2 weeks for annual weeds. Perennial weeds such as poison ivy may take 4 or more weeks for complete kill.
- [optional text] Plants such as ornamental flowers, trees, and shrubs may be planted 30 days after application.

ENTRY RESTRICTIONS

Do not allow people or pets to touch treated plants until sprays have dried.

[ALTERNATE TEXT] [Reentry icon] To prevent tracking product to unintended areas such as your yard, keep people and pets out of treated area until spray has dried.

ADDITIONAL TIPS [optional section]

To Kill Vines

- If vines are growing up poles, fences or tree trunks with mature bark, cut vines to a height of 3 to 4 feet and spray vines thoroughly.
- If vines are climbing shrubs or tree trunks with green bark, cut vines at base and treat as directed for stumps or spray its regrowth. If spraying regrowth, shield shrubs and tree trunks from spray drift with a sheet (piece) of cardboard or plastic.

To Kill Stumps: (This treatment will control or suppress many types of woody brush and trees, such as alder, bluegum eucalyptus, madrone, oak, giant reed, saltcedar, sweetgum, and tan oak).

- Cut living stump close to ground.
- Drive (drill) 4 to 5 holes into freshly cut stump.
- Immediately pour undiluted product into holes.

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

Kudzu

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

Wild Blackberry

Spray anytime plants are actively growing. Dead canes should be cut down and removed. Reapplication (may be necessary) is often required to kill deep roots.

Poison Ivy & Poison Oak

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

To Kill Bamboo:

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

For Lawn Replacement (Renovation) : *[remove advisory statement #1 if renovation use is included in final printed label]*

Use [insert brand name] to kill a (an old) (an unwanted) lawn and (its) weeds before

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planting (a) new lawn. (OR prior to laying a patio, sidewalk, or driveway).

[Alternate text] For lawn replacement use [insert brand name] to kill lawn and weeds before planting new lawn.

- Skip one mowing before spraying.
 - If soil is dry, water before application and 2 to 3 days after application.
 - Wait (at least) 3 days after last application to rake, till or replant with seed or sod.
- [ALTERNATE TEXT]
- Wait (at least) 3 days for weeds and lawn to die. Repeat if necessary.
 - Rake or till to prepare area for planting seed or sod.
- [optional text] If green patches remain after 7 days, reapply.

For Flowerbed (Ornamental Plot) Preparation [remove advisory statement #1 if renovation use is included in final printed label]

Use [insert brand name] to kill weeds, grasses and brush before planting flowers, trees or shrubs.

- If soil is dry, water before application and 2 to 3 days after application.
- Apply evenly over treatment area.
- [optional text] Wait 4 to 6 days for [insert brand name] to kill plants then cleanup plant refuse and till soil.
- Wait (at least) 1 day before planting flowers and 30 days before planting trees and shrubs.

For Wildlife Areas

Use to prepare areas for planting wildlife food. Undesirable (or exotic) plants can be controlled to allow for planting or recovery of native plant species. Spot treatments can be made to selectively remove unwanted plants. If desirable plants are accidentally sprayed, rinse off immediately.

(For special ornamental plants call [insert contact telephone #] for specific information)

WHEN TO REPLANT [optional replant section]

- Ornamental flowers may be planted **1 day** after application.
- Lawn grasses may be planted **3 days** after application.
- Non-conifer trees and shrubs may be planted **14 days** after application.
- Conifer trees and shrubs may be planted **30 days** after application.

[ALTERNATE TEXT]

Plants such as ornamental flowers, trees, and shrubs may be planted 30 days after application.

optional weed list section

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KILLS ALL TYPES OF (TOUGH) WEEDS & GRASSES INCLUDING: (KILLS WOODY BRUSH & VINES INCLUDING) [optional illustration]

Alder	Ash	Aspen	Blackberry
Broom (French, Scotch)	Buckwheat	Ceanothus	Chamise
Cherry	Coyote Brush	Dewberry	Elderberry
Elm	Eucalyptus	Hawthorn	Hazel
Honeysuckle	Kudzu	Locust	Maple
Oak	Persimmon	Poison Oak	Poison Ivy
Poplar	Raspberry	Sage	Sagebrush
Salmonberry	Sassafras	Sumac	Sweetgum
Thimbleberry	Tree Tobacco	Trumpetcreper	Wild Rose
Multiflora Rose	Willow	Bamboo	Wild Grape Vine

PLUS Over 100 Unwanted Plants, Weeds & Grasses

PLUS all types of weeds & grasses.

WEEDS (including):

Annual Ryegrass	Annual Bluegrass	Barnyardgrass	Beggarweed
Black Medic	Blue Toadflax	Brassbuttons	Blue Mustard
Buttercup	Bromegrass	Bur Clover	Chickweed
Common Groundsel	Common Plantain	Crabgrass	Creeping Beggarweed
Diffuse Lovegrass	Dog Fennel	Evening Primrose	False Dandelion
Fiddleneck	Fall Panicum	Field Pennycress	Field Sandbur
Filaree	Florida Pusley	Foxtail	Goosegrass
Garden Spurge	Horseweed/ marestail	Henbit	Knotweed
Lambsquarters	Little Bitter Cress	London Rocket	Maiden Cane
Mallow	Mayweed	Mouseear Chickweed	Oxalis
Pennsylvania Smartweed	Prickly Lettuce	Prostrate Spurge	Puncture Vine
Redroot Pigweed	Sandspur	Shepherdspurse	Smooth Cat's Ear
Smooth Pigweed	Sowthistle	Spotted Spurge	Tansy Ragwort
Tansy Mustard	Teaweed	Texas Panicum	Tumble Mustard
Sprangletop	Witchgrass	Wild Mustard	

Brush (Tough Weeds) and Perennials (including):

Alder	Artichoke Thistle	Bahiagrass	Bentgrass
Bermudagrass	Blackberries	Broadleaf Plantain	Canada Thistle
Cherry species	Common Ragweed	Creeping Bentgrass	Creeping Charlie
Curly dock	Dandelion	Dallisgrass	Dewberry
Common Mullein	Cattail	Cocklebur	Ceanothus
Cogongrass	Coyote Brush	Elderberry	False Dandelion

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Fescue species	Field Bindweed	(Wild Morningglory)	Honeysuckle
Horseradish	Kikuyugrass	Milkweed	Knapweed
Guineagrass	Horsenettle	Iceplant	Lantana
Nightshade, silverleaf	Johnsongrass	Kentucky Bluegrass	Kudzu
Mulberry	Multiflora Rose	Nimblewill	Nutsedge
Oak species	Oldenlandia	Orchardgrass	Oxalis
Pennywort	Perennial Ryegrass	Poison Hemlock	Quaking Aspen
Pampasgrass	Poison Oak	Poison Ivy	Primrose
Purple Nutsedge	Ragweed	Raspberry	Red Clover
Quackgrass	Smooth Bromegrass	St. Augustinegrass	Sumac
Tall Fescue	Timothy	Torpedograss	Trumpetcreeper
Vaseygrass	Virginia Creeper	Wild Sweet Potato	Wild Oats
White Clover	Whitotop	Wild Barley	Wild Strawberry
Willow	Yellow Starthistle	Yellow Nutgrass	Zoysiagrass

* For additional weeds controlled by this product call 1-888-Roundup

STORAGE AND DISPOSAL [optional trash can illustration]

PESTICIDE STORAGE: Store product in original container in a safe place away from direct sunlight. **DISPOSAL: If Empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or (insert contact telephone #) (or other appropriate 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. Harmful if inhaled. Avoid contact with eyes, skin or clothing. Avoid breathing spray mist.

FIRST AID <i>[Optional First Aid icon]</i>	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes. • Call a poison control center (insert contact telephone #) or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center (insert contact #) or doctor for additional treatment advice.
IF ON SKIN	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center (insert contact #) or doctor for treatment advice.
Emergency Medical Information	
<ul style="list-style-type: none"> • 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. 71995-50. 	

Environmental Hazards:

The diquat component of this pesticide is toxic to aquatic invertebrates. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

[Optional statement] This chemical demonstrates the properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soil is permeable, particularly where the water table is shallow, may result in ground water contamination.

NOTICE: BUYER ASSUMES ALL RESPONSIBILITY FOR SAFETY AND USE NOT IN ACCORDANCE WITH DIRECTIONS.

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).

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This is an end-use product. Monsanto does not intend and has not registered it for reformulation or repackaging.

[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 graphic – Roundup product family photo]

www.Roundup.com

Visit www.stoppoisonivy.com to learn more about how to identify and effectively eliminate tough, nuisance weeds such as poison ivy and for more information about [insert brand name].

[Insert relevant trademark statements].

© [] MONSANTO COMPANY
(Produced) Manufactured for Monsanto Company
Lawn and Garden Products
P.O. Box 418
Marysville, OH 43041-0418
EPA Reg. No. 71995-50
EPA Est. No. _____
Superscript is first letter of lot number.
PPN
Made in USA

APPENDIX 1 – Consolidated List of Label Claims
[Ordered alphabetically]

- ASPCA approved [ASPCA seal of approval to be submitted]
- Allergy Sufferers – Get rid of those problematic weeds
- Alleviate allergy suffering by killing those pollen producing weeds
- Approved for most (many) lawn and garden uses
- Brush and ivy killer
- Can be used for habitat restoration, controlling exotic vegetation, and for site preparation of wildlife food plots.
- Can reseed or sod lawns 3 days after treatment
- Child Resistant Cap
- Clear Brush Away
- Clears Brush

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- Completely kills even the toughest weeds and grasses.
- Concentrate – Just Add Water
- Concentrated For Extra Value
- 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.
- Control allergy causing weeds
- Control Poison Ivy, Poison Oak and other tough brush
- Control tough brush
- Control(s) (any weed(s) listed on Weeds Controlled table)
- Control weeds that cause allergies
- Controls the hardiest (toughest) weeds (brush)
- Covers up to Y sq ft [$Y = 300 \times (\text{net contents in ounces} \div 6)$]
- Covers up to 300 sq ft per gallon of spray
- Dead Weeds Guaranteed (or Your Money Back)
- Does not have soil activity
- Easy To Use (convenient, handy, useful, well-situated)
- Economical- mix 12 Tablespoons (6 oz) per gallon
- Eliminate allergy causing plants without touching the plants that cause them
- Eliminate allergy causing plants (weeds) without handling (touching) them
- Eliminate plants that cause allergies
- Eliminate Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu, Bamboo, (any weed listed on Weeds Controlled table)
- Eliminate tough weeds (brush) (poison ivy) around homes, buildings, cabins, camp sites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas
- Eliminate weeds – No handling required
- Eliminate Woody Plants
- Enters the plant within 30 minutes (one, two hours), won't wash off
- Eradicate Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Exclusive Roundup Formula
- Experience The Roundup Advantage (peel back this panel for detail) (see details inside/underneath this booklet) (see details on back panel)
- 33% Faster
- Fast Uptake
- FastAct™ Technology
- Fast Acting Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) Killer
- Fast Acting Brush Killer
- Powered by Roundup
- Fast Acting
- With Roundup Power

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- For general weed control
- Get rid of brush (tough weeds)
- Get rid of those allergy causing plants
- Great for clearing brushy fields.
- Great for Poison Ivy, Poison Oak, Poison Sumac, Blackberry, Kudzu
- Great for use around flowers, shrubs and trees
- Guaranteed (Results) (Satisfaction)
- Guaranteed same effective results even if it rains within hours
- Improved for tough weed control
- Increased strength for Intense Weeds
- Kill Poison Ivy Without Contact (Handling)
- Kill Poison Ivy (Brush)(Tough Weeds) (Kudzu) quickly
- Kill tough weeds (Brush) Without Contact (Touching Them, Handling)
- Kills 100+ tough weeds, Plus over 100 additional weeds
- Kills over 100 weeds
- Kills (spray) weeds in flower beds and around fences, trees, shrubs, driveways, walkways and shrubs, in and around fences, patios, paths, sidewalk cracks, walkways.
- Kills all types of tough weeds
- Kills even the toughest brush
- Kills Poison Ivy, Poison Oak, Poison Sumac, Wild Blackberry, Kudzu
- Kills the toughest brushy weeds
- Kills tough and hard-to-kill weeds!
- Kills tough brush down to the root
- Kills tough ivy
- Kills tough (the toughest) weeds (& Brush) (Without Handling)
- Kills tree stumps and vines
- Kills Ugly, Annoying Weeds (Brush)
- Kills the root so (treated) weeds don't come back
- Kills the roots! First time, Every time!
- Kills (to) the root(s)! (Guaranteed!)
- No root. No weed. No problem.
- Kills the weed you see and the root you don't
- Kills (tough) weeds (grasses, brush, woody plants, vines) roots and all
- Kills in 1 To 2 weeks
- Kills Weeds Dead
- More concentrated
- More effective
- Multipurpose grass & broadleaf weed control
- NEW!
- New formula (formulation)

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- No root. No weed. No problem®.
- Now
- Perfect for (use around) homes, buildings, cabins, campsites, lodges, tent areas, trailers, wooded lots, recreational areas, parks, sports facilities and wildlife areas.
- Prevent Stump and Vine re-growth
- Provides maximum control
- Quick uptake, eliminates weather concerns
- Rainfast (Rainproof) in (less than) (10, 30, 45, 60, 90 minutes; 2 hours, 1 hour) - enters the plant on contact
- Rainfast (Rainproof) in (less than) (10, 30, 45, 60, 90 minutes; 2 hours, 1 hour) for control that won't wash away
- Remove allergy causing plants from your yard
- Results in 3 days (1 day, 24 Hours, 12 Hours)
- Rid your yard of allergy causing plants
- Roundup's effectiveness (exclusive formula) won't wash away by rain or watering (10, 30, 45, 60, 90 minutes; 2 hours, 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after treatment
- [*insert brand name*] **Fast Acting** Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) killer
- [*insert brand name*] – control weeds with confidence (certainty, assurance)
- Roundup's effectiveness (exclusive formula) won't wash away by rain or watering (10, 30, 45, 60, 90 minutes; 2 hours, 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after treatment
- Roundup's [*or insert brand name*] exclusive (patented) formula (technology) kills to the root so treated weeds don't come back
- Satisfaction guaranteed (or your money back with proof of purchase)
- Starts working immediately
- See results on Poison Ivy (Brush)(Tough Weeds)(Brambles)(Kudzu) in less than a week (5/7 days)
- Specially formulated to kill the toughest weeds
- Spray woody brush, trees and vines around houses, buildings, wooded lots, vacant lots, storage and recreational areas and along fences and driveways, or anywhere tough weeds are growing.
- Starts working fast
- Strong (-er, -est)
- Strong enough to kill even the toughest brush
- Stronger formula kills brush and poison ivy
- Stronger formula kills to the roots
- The Better Brush Killer
- The Complete Brush Killer
- The easy (-ier, -iest) way to control brush

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- The tough weed solution
- Tough on weeds and grasses that cause allergies
- Tougher formula Tougher than the toughest weeds
- Trusted Results for Guaranteed Satisfaction
- Use as a first step for renovating or replanting your lawn
- Use as a first step for turning brushy fields into grassy areas or parks
- Use for Stump Treatment
- Use in (apply with) a BIG SHOT Multi-Purpose Sprayer or other tank sprayer, ORTHO® DIAL'n SPRAY®, or other ORTHO hose-end sprayers
- Use [insert brand name] to control tough brush around patios, driveways, gravel and mulch beds
- Use to control brush along fences, paths and foundations.
- Use to edge around lawns
- Use to prepare sites for large plantings, for planting flower beds, ornamentals, and renovating lawns
- Use to refill [insert brand name for Reg. No. 71995-NEW] Ready-To-Use containers
- Visible results in 24 hours (12hours)
- Water - based formula
- Won't wash away (off)
- Works first time, every time (guaranteed)
- Works in 1 day (24 Hours)
- Works on (any weed(s) listed on Weeds Controlled table)
- Works systemically
- (Contains) (With) FastAct™ (Technology)
- Starts working (dying) in 24 hrs (1 day)

APPENDIX 2 – Packaging Related Claims

- NET xx fl oz (qt or gal) (xx mL or L)
- 5 fl oz (148 mL)
 - 6 fl oz (177 mL)
 - 8 fl oz (237 mL)
 - 9 fl oz (266 mL)
 - 10 fl oz (296 mL)
 - 13 oz (384 mL)
 - 16 fl oz (1 pt) (473 mL)
 - 32 fl oz (1 qt) 946 mL)
 - 36.8 oz (15% more than 1 quart size)
 - 40 fl oz (1.18 L)
 - 53.7 fl oz (0.42 gal) (1.5 L)
 - 64 fl oz (1/2 gal) (1.89 L)
 - 128 fl oz (1 gal) (3.79 L)

[Net contents] Makes up to 'X' gallons
Mix with water to make 'X' gallons of spray solution
Treats (covers) up to 'Z' sq ft (approximate size of 'XX' tennis court)
Mix with water to cover up to 'Z' sq ft

$$[X = \text{net contents} \div 6]$$
$$[Z = X * 300]$$
$$[XX = Z \div 2808]$$

[Pint] Makes up to 2½ gallons
Mix with water to make 2½ gallons of spray solution
Covers up to 750 sq ft
Mix with water to cover up to 750 sq ft

[Quart] Makes up to 5 gallons
Mix with water to make 5 gallons of spray solution
Covers up to 1,500 sq ft
Mix with water to cover up to 1,500 sq ft

[0.42 Gallon] Makes up to 9 gallons
Mix with water to make 9 gallons of spray solution
Covers up to 2,700 sq ft
Mix with water to cover up to 2,700 sq ft

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[Half Gallon] Makes up to 10 gallons
Mix with water to make 10 gallons of spray solution
Covers up to 3,000 sq ft
Mix with water to cover up to 3,000 sq ft

[Gallon] Makes up to 21 gallons
Mix with water to make 21 gallons of spray solution
Covers up to 6,400 sq ft
Mix with water to cover up to 6,400 sq ft

- BONUS SIZE []% MORE!
- Larger size, covers up to [] sq ft
- *With (the convenient) measuring cup, mixing [Insert brand name] (controlling weeds around your home) has never been easier*
- *With (the convenient) measuring cup, controlling weeds all around your home has never been this fast and easy*
- BUILT-IN MEASURING CAP AND POUR SPOUT INCLUDED
- Easier to measure and pour.