

71995-52

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

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

JAN 24 2013

Dawn Fee-White
Monsanto Company, Lawn and Garden Products
1300 I Street, NW, Suite 450 East
Washington, DC 20005

Subject: Label Amendment (Physical and Chemical Hazards Rebuttal)
M1732 Herbicide
EPA Reg. No. 71995-52
Application Dated June 8, 2012

Dear Ms. Fee-White:

After further consideration, we agree with the justification provided in your rebuttal regarding the appropriate Physical and Chemical Hazards language, and rescind our previous requirement to use the statement "Do not use with or store near oxidizing or reducing agents."

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

A stamped copy of the label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products released for shipment after eighteen (18) months from the date of this letter must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at ondish.mindy@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis".

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

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

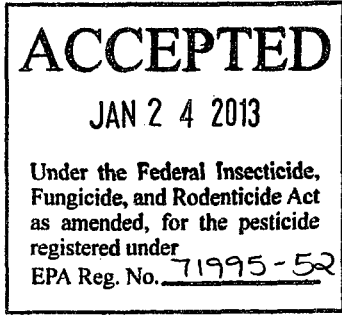
[FRONT LABEL]

M1732 Herbicide

[Insert Claims from Appendix 1]

Active Ingredients:

Glyphosate in the form of its potassium salt	1.8%
Pelargonic acid and related fatty acids	2.0%
Other Ingredients	96.2%



Keep Out of Reach of Children

CAUTION

See back panel label booklet for complete precautions.

Mantener Fuera del Alcance de los Niños

PRECAUCIÓN

Vea declaraciones adicionales de precaución en el reverso del panel

NET [INSERT FL OZ or GAL] (INSERT CONVERSION)

- NET 24 FL OZ (1 PT 8 FL OZ)
- NET 30 FL OZ (1 PT 14 FL OZ)
- NET 64 FL OZ (1/2 GAL)
- NET 1 GALLON (128 FL OZ)
- NET 1.25 GAL (1 GAL, 23 FL OZ)
- NET 1.33 GALLON (1 GAL, 42 FL OZ)
- NET 1.5 GALLON (1 GAL, 64 FL OZ)

2DCODE
PRINT CODE
SPEC #

BACK LABEL BOOKLET COVER

(ALTERNATIVE WORDING FOR OPENING BOOKLET AFFIXED TO BOTTLE)

OPEN/ABRA

Open for detailed instructions

Resealable Label for Directions & Precautions

OPEN booklet for Assembly & Use Instructions

Press to Reseal

DID YOU KNOW?

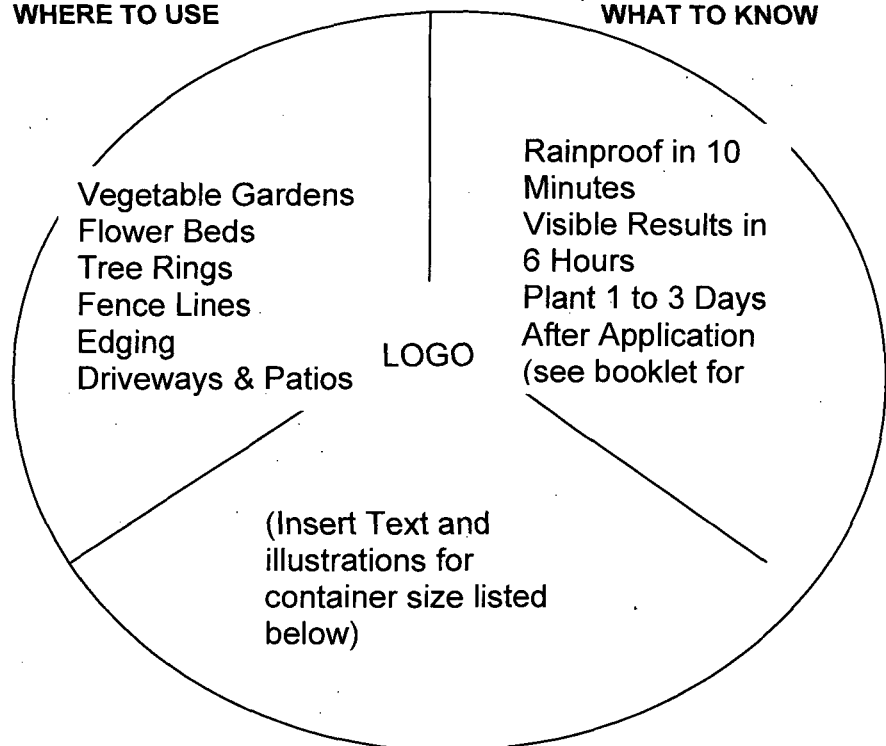
[Insert claim from Appendix 1]

[Insert circle graphic w/ generic logo in center]

(Optional illustrations for each section)

WHERE TO USE

WHAT TO KNOW



Vegetable Gardens
 Flower Beds
 Tree Rings
 Fence Lines
 Edging
 Driveways & Patios

Rainproof in 10
 Minutes
 Visible Results in
 6 Hours
 Plant 1 to 3 Days
 After Application
 (see booklet for

(Insert Text and
 illustrations for
 container size listed
 below)

HOW TO USE

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HOW TO USE [insert appropriate illustrations]

[24 oz & 30 oz]	Adjust nozzle Spray weeds.
[64 oz, .75 gal, 1 gal, 1.1 gal]	Pull tubing out Insert into cap (until it clicks)
	Flip cap up Adjust spray nozzle Spray weeds.
[1.25 gal]	Pour into empty (insert brand name of 71995-NEW) (Pump 'N Go®) container. Do NOT add water
[1.33 gal Pull N Spray]	Connect hose. Flip up spout Pull ring slowly Adjust spray nozzle Press button & spray weeds
[1.33 gal Battery]	Connect hose Flip out wand Unlock & spray weeds Let go & spray weeds
[1.33 gal Pump N Go]	Unwind hose and connect Extend wand Pump X-X times to prime Aim wand & spray

Produced for Monsanto Company
Lawn & Garden Products
P.O. Box 418, Marysville, OH 43041
EPA Reg. No. 71995-NEW
EPA Est. 239-IA-3(I); 239-MS-001(M) [additional EPA Establishments as contracted]
(I) or (M) designates the first letter of lot number printed on container
Made in USA

PPN
LB #
2D CODE · UPC

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[Inside booklet]

[Optional Section]

(PRODUCT FACTS)

Container treats more than [] weeds [See Appendix 2 for calculation]

Treats up to [] sq ft [see Appendix 2 for calculations]

WHERE TO USE

- On patios, walkways, & driveways, gravel, or mulch beds
- Around (In and around) flower beds &(or) vegetable gardens
- Around shrubs & trees
- Along fences & foundations (Edging around foundations and retaining walls)
- On wooded or (and) vacant lots
- Other areas of your yard (Plus other areas where (tough) weeds are invading your yard)

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 Type as applicable]

[Insert Sprayer-specific assembly/use instructions as applicable from package instructions in Appendix 3]

HOW IT WORKS

Glyphosate is absorbed by the weed leaves and moves through the weed to the root, stopping the function of an essential enzyme found in plants (but not humans or animals). Weeds die to the root. Kills only what you spray. Any product not absorbed by plants binds to the soil and does not move to affect untreated plants. Weeds begin to yellow and wilt within hours with complete kill in 1 to 2 weeks.

HOW TO APPLY

[Optional text for Sprayer Devices]

- Follow illustrations and instructions to ready (prime) the sprayer.

[Optional text for Non-foaming Sprayers]

- Adjust (twist) nozzle at end of sprayer to a coarse spray.

[Optional text for Trigger Sprayers only]

- Adjust nozzle to the desired spray setting (FOAM or SPRAY).

[All sprayers]

- Spray the weeds or grasses you want to kill until thoroughly wet (or covered with foam).
- 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.

[Optional Text for non-trigger sprayer]

Use this product to refill an empty [Insert Brand Name] (Pump 'N Go sprayer or) container by pouring product slowly to avoid foaming directly into the empty container. Do not add water.

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IMPORTANT

- Spray when air is calm to prevent drift to desirable plants.
- **Do not use for spot weed control in lawns since glyphosate kills lawn grasses.**

WHEN TO APPLY

- Apply during sunny weather (to accelerate systemic movement from foliage to roots). Effective results can be obtained when applications are made under cool and cloudy conditions as low as 50° F.
-
- **RAINPROOF:** Rain or watering 10 minutes after application will NOT wash away effectiveness.
- Apply when weeds are small and before seeds form.
- Established (perennial) (hard to kill) weeds may require a repeat application.
- Weeds yellow and wilt within 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.

[INSERT ICON] People and pets may enter treated areas after spray has dried.

WHEN TO REPLANT

- All ornamental flowers, trees and shrubs may be planted **1 day after** application.
- Lawn grasses, herbs, vegetables (all) and fruits may be planted **3 days after** application.

WHEN TO HARVEST [OPTIONAL SECTION]

If used to control weeds around fruits or nuts, wait the following number of days before harvesting:

- Citrus (Citron, Grapefruit, Kumquat, Lemon, Lime, Mandarin, Orange, Pummelo, Tangelo, Tangerine), Guava, Papaya – **1 day.**
- Nuts (Almond, Beechnut, Brazil Nut, Butternut, Cashew, Chestnut, Filbert, Hazelnut, Hickory Nut, Macadamia, Pecan, Pistachio, Walnut) – **3 days.**
- Apple, Avocado, Banana (Plantains), Berries (except Cranberries), Dates, Figs, Grapes, Loquat, Passion Fruit, Pear, Persimmon, Pomegranate & (and) Quince – **14 days.**
- Apricot, Cherries, Nectarine, Olives, Peach, Plum and (&) Prunes– **17 days.**

(HOW TO) REFILL [OPTIONAL SECTION]

To refill this empty container pour product carefully and directly from the *[Insert Brand Name]* container designated as the ready-to-use refill container. **DO NOT** add water

[Alternate Refill Wording]

To refill this empty container with a concentrated product add *[insert from list]* of *[Insert Concentrate Product Brand Name]* then fill with water very slowly to avoid foaming.

- [24 FL OZ – 1 fl oz]
- [30 FL OZ - 1 fl oz]
- [0.5 GAL – 2.5 fl oz]

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- [0.75 GAL – 3 fl oz]
- [1.0 GAL – 5 fl oz]
- [1.1 GAL – 5.5 fl oz]
- [1.33 GAL – 6.5 fl oz]
- [or calculate at 5 fl oz per gal]

[ALTERNATE TEXT FOR READY-TO-USE REFILL CONTAINER]

Refill the empty *[Insert Brand Name]* (Pump 'N Go) container by pouring product carefully and directly into the container. DO NOT add water.

ADDITIONAL USES [OPTIONAL SECTIONS]

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 regrowth. If spraying regrowth, shield shrubs and trees with green bark from spray drift with a sheet (piece) of cardboard or plastic

For Lawn Replacement

Use this product *[Insert brand name]* to kill a (an old) (an unwanted) lawn and (its) weeds before planting a new lawn (OR prior to laying a patio, sidewalk, or driveway).

- Skip one mowing before spraying.
- If soil is dry, water before application and 2 to 3 days after application. Do not apply to wet plants.
- If green patches remain after 7 days, reapply.
- Wait (at least) 3 days after last application to rake, till or replant with seed or sod.

Kudzu

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

Wild Blackberry

Spray when plants are actively growing. Cut down dead canes and remove. Reapplication 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 growing, but at least 4 weeks before the first killing frost in the fall. Reapply, if new growth appears. Wear rubber gloves and handle dead plants carefully. Dispose of dead plants and rubber gloves in tightly sealed garbage bags. Thoroughly wash clothes in hot, soapy water.

For Flowerbed and Garden (Plot) Preparation

Use this product *[Insert brand name]* to kill weeds, grasses and brush before planting flowers, fruits, vegetables, trees or shrubs.

- If soil is dry, water before application and 2 to 3 days after application.
- Apply evenly over treatment (plot) area.

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- [OPTIONAL TEXT] Wait 4 to 6 days for product to kill plants then cleanup plant refuse and till soil.)
- Wait 1 to 3 days after last application before planting garden (flowers, trees and shrubs). (See **When To Replant** section for details.)

KILLS ALL TYPES OF WEEDS & GRASSES [OPTIONAL SECTION]		
Bahiagrass	Evening Primrose	Pennywort
Bentgrass	False Dandelion	Perennial Ryegrass
Bermudagrass	Fennel	Primrose
Bindweed	Fescue	Prostrate Spurge
Black Medic	Fiddleneck	Puncture Vine
Blue Toadflax	Filaree	Quackgrass
Bluegrass	Florida Pusley	Ragweed
Brassbuttons	Garden Spurge	Sandspur
Broadleaf Plantain	Henbit	Shepherdspurse
Bromegrass	Johnsongrass	Smooth Cat's Ear
Bur Clover	Knotweed	Sowthistle
Canada Thistle	Lambsquarters	Spotted Spurge
Chickweed	Little Bitter Cress	St. Augustinegrass
Crabgrass	London Rocket	Tall Fescue
Common Plantain	Maiden Cane	Tansy Ragwort
Common Groundsel	Mallow	Torpedograss
Creeping Bentgrass	Mayweed	White Clover
Creeping Charlie	Mouseear Chickweed	Whitetop
Creeping Beggarweed	Nimblewill	Wild Morning Glory
Curly Dock	Oldenlandia	Wild Barley
Dandelion	Orchardgrass	Yellow Nutgrass
Diffuse Lovegrass	Oxalis	Zoysia
Dog Fennel	Pennsylvania Smartweed	

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

STORAGE AND DISPOSAL

[Non-Trigger Sprayer Refill]

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

[All Trigger Sprayers up to 64 oz]

PESTICIDE STORAGE: Rotate nozzle to closed position. Store product in original container in a safe place away from direct sunlight. Keep from freezing.

[Quick Connect Sprayer 64 oz up to 1.33 gal]

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

[Pull 'N Spray 1.33 gal]

PESTICIDE STORAGE :

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

[Pump 'N Go 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.

CONTAINER HANDLING:

[All Sprayer packaging]

Nonrefillable container. Do not reuse or refill this container unless the directions for use allow a concentrated product to be diluted or ready-to-use product to be poured directly into the container. Refill this container according to the directions contained in the **HOW TO REFILL** section.

[Non-sprayer packaging]

Non-refillable container. Do not reuse or refill this container.

[ALL Packaging Types]

If Empty: Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency (or other appropriate toll free number) for disposal instructions. Never place unused product down any indoor or outdoor drain.

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PRECAUTIONARY STATEMENTS	
HAZARDS TO HUMANS & DOMESTIC ANIMALS	
CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.	
-FIRST-AID-	
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 24 hour contact #), or doctor for additional 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 24 hour contact telephone #] for emergency medical treatment information. • This product is identified as [Insert brand name], EPA Reg. No. 71995-NEW 	

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.

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

[Insert relevant trademark statements]

(lot or batch number is printed directly on the bottle)

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[OPTIONAL TEXT]

ROUNDUP FAMILY OF PRODUCTS

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

[Insert graphic – Roundup product family photo]

[OPTIONAL TEXT]

Roundup Lawn & Garden products have the best solutions to your toughest weed problems.

Visit the Roundup website, www.roundup.com, to learn more about the Roundup family of products

[Insert list of Roundup family products and key benefit statement]

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.

[phone icon] Questions, Comments or Information [computer icon]
Call (insert contact #) or Visit www.roundup.com

© [insert year] MONSANTO COMPANY

Produced (Manufactured) for Monsanto Company
Lawn & Garden Products
P. O. Box 418
Marysville, OH 43041
PPN
Spec #
EPA Reg. No. 71995-NEW
EPA Est. 239-IA-3(I); 239-MS-001(M)
(I) or (M) indicates is first letter of lot number
Made in USA
(lot or batch number is printed directly on the bottle or case)

APPENDIX 1 – Consolidated List of Label Claims

- *[Insert brand name]* Use where unwanted weeds and grasses grow, including patios, walkways, and driveways; along fences; in landscaping beds; or around flowers, shrubs and trees
- *[Insert brand name]* exclusive (patented)-formula (technology) kills to-the-root so weeds don't come back
- *[Insert brand name]* kills weeds and grasses in and around Patios, Driveways, Sidewalks, Ornamental Gardens and other non-lawn areas
- 30 - 50% Faster (even in the Spring) (even when it's dry) (even when it's cool)
- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact, starts working immediately
- Advanced formula
- After *[graphic of dead weed]*
- All-Season Formula (Delivers 12 hour results all year (even in cool and cloudy weather))
- All-weather Formula (Results in 12 hours)
- Approved for use in vegetable gardens
- Before *[graphic of live weed]*
- Begins absorbing on contact
- Begins working in hours
- (Can) Reseed or sod lawns 3 days after treatment
- * 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® technology
- Contains glyphosate
- Contains Pelargonic (acid)
- Controls existing weeds, is not a pre-emergent
- Convenient (to use)
- Dead Weeds Guaranteed *(or Your Money Back)
- Degrades in soil (over time)
- Does not move in or on the soil to affect nearby plants
- Easy To Use
- Easy to store
- Easy-to-use applicator
- Economical
- Effective (even) in cool and cloudy conditions (as low as 50°F)
- Eliminate weeds – No handling required
- Eliminates pulling (the need to pull) weeds
- Enters the plant quickly won't wash off (even if it rains in 10 minutes)
- Exclusive formula
- Fast acting formula
- Fast-acting formula absorbs to root quickly
- For control of tough weeds that won't wash away
- (Use) For weed control along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings, and in brick and gravel walkways.

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- (For Landscaping:) Use to prepare landscape areas for planting of ornamentals, trees, shrubs, desert landscapes, rock gardens, flowerbeds or similar plantings.
- (Use) For Spot Spraying: Use in and around flowerbeds, ornamental, fruit and nut trees, grapevines, shrubs, fences, driveways and walkways
- Gets to the root in hours
- Glyphosate targets an enzyme found in plants but not in people or pets
- Got Tough Weeds - Get [*Insert brand name*]
- Guaranteed (we guarantee it) [*qualify guarantee*]
- Guaranteed effective: Kills over 200 types of weeds and grasses, roots and all, with [*Insert brand name*] [*qualify guarantee*]
- Guaranteed results (satisfaction) (with one application) [*qualify guarantee*]
- Guaranteed same effective results even if it rains [*qualify guarantee*]
- Ideal for killing unwanted weeds and grasses throughout your yard.
- Ideal for spot treatment on driveways, sidewalks, and patios
- Ideal for tough to reach weeds found in flower(beds) and vegetable gardens
- Ideal for vegetable garden weed control
- Improved extra strength formula
- Improved for tough weed control
- Improved formula, completely kills even the toughest weeds and grasses with just one application
- Keep driveways, walkways, landscaping beds, and flower gardens weed-free
- Kill tough weeds and grasses
- Kill Tough Weeds Quickly
- 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 (the toughest weeds and grasses) to the root so they don't come back
- [*Insert brand name*] Kills the weed you see and the root others leave behind
- Kills the weed you see and the root you don't
- Kills weeds and grasses in 2 to 4 weeks - roots and all
- Kills tough weeds in 1 to 2 weeks
- Kills (to) the root(s) (Guaranteed) [*qualify guarantee*]
- Kills (annual and perennial) weeds, grasses and other unwanted plants
- Kills even tough weeds
- Kills existing weeds only, no residual activity in soil
- Kills Kudzu
- Kills more weeds in more places.
- Kills over 100 weeds
- Kills the root(s) (so weeds don't come back) (first time, every time) (guaranteed) [*qualify guarantee*]
- Kills weeds clear down to the root, 1st time, every time so weeds don't come back – guaranteed [*qualify guarantee*]
- Kills Tough Weeds (& Grasses) (to the Root)
- Kills Ugly, Annoying Weeds (Brush)
- Kills undesirable (unwanted) weeds (and grasses)
- Kills weeds (and unwanted grasses) - roots and all
- Kills weeds, roots and all

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- Lawns and gardens can be reseeded or planted soon after treatment
- Non-selective grass and weed control
- New
- New Formula
- Next day (this weekend) results: Begins killing on contact, visible results in 6 hours
- ~~No Mix, No Mess~~
- No Mixing (necessary)
- No odor
- No Root, No Weed, No Problem®
- No waiting, weeds wilt in hours
- Now
- Once it enters the plant, it won't wash off
- One application kills over 200 types of weeds and grasses, roots and all (maximum effectiveness)
- Ornamental gardens can be reseeded or planted 1 day after treatment
- Outdoor use only [optional graphic]
- Overnight speed
- Patented FastAct Technology
- Pelargonic (acid) makes the difference!
- Pour refill [directly] into Pump 'N Go Sprayer. Do Not add water
- Proven (trusted) performance: Only Roundup brands work the first time, every time – and have for over 30 years
- Quick and easy to use
- Quick uptake, eliminates weather concerns
- Quick visible results
- Rainfast
- Rainproof Protection in 10 minutes after application. (for control that won't wash away)
- Rapid results
- Ready-To-Use (grass & weed killer) (Tough Weed Killer)
- Requires no mixing
- Results in hours (even when it's cool) (even in the Spring)
- Results that show
- Same day results
- Satisfaction guaranteed* or we will gladly refund purchase price
- Satisfaction guaranteed* or your money back with proof of purchase
- See results in 6 hours (overnight) (days)
- Speedy results
- Starts to kill the same day (in hours) (overnight) (fast)
- Strong Formula. Better Kill! (Complete Kill)
- Suitable for use around flower beds, gardens, trees, shrubs, fences, and walks (walkways)(sidewalks)
- Systemic grass and weed killer for spot treatment of undesirable vegetation
- The easy way to kill tough weeds (and brush)
- The fast weed killer (starts working immediately)
- The fastest Roundup brand weed & grass killer

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- Glyphosate targets an enzyme found in plants, but not in people or pets
- Tough formula (kills to the roots)
- Transorb technology speeds glyphosate to the root to kill even tough weeds
- Trusted Results for Guaranteed Satisfaction (Open booklet for details*) *[qualify guarantee]*.
- Use around flower beds, trees and shrubs
- ~~Use around fruits and vegetables~~
- Use in and around vegetable gardens
- Use to trim and edge landscape areas.
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction.
- (Provides) Visible (see) results in 6 hours [in hours] (days)
- WATER BASED *[icon]*
- Where it Works
- Will not build up in soil to hurt desirable plants growing nearby
- Won't wash off treated plants
- Works first time, every time (guaranteed) *
- Works in [insert value between 1 and 24] hours
- Works only when absorbed by the foliage of weeds
- Works overnight
- Works to the root(s) in hours

[Promotional options]

- Save up to \$[x] on (your) next purchase
- [X]% Free
- Great Value
- Bonus Size
- Bonus
- Free weed guide inside
- Free [] with this purchase of [Insert Brand Name] (container size)
- FREE REFILL
- FREE SAMPLE
- SAMPLE NOT FOR SALE
- VALUE SIZE
- Pump N Go Refill
- Refill Size
- Combo Pak
- Free *[insert offering]*
- *[insert price of free item] Value*

APPENDIX 2 – Packaging Related Claims

Treats up to 'X' sq ft

$$[X = \text{net contents (fl oz)} \div 128 \times 300 \text{ sq ft}]$$

$$[Y = X \div 2808]$$

Quick-Connect Sprayer (64 oz, 1 gal, 1.1 gal)

- 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)

- Targets what (the weeds) you want to spray (kill)
- Accurately targets the weeds you want to spray (kill)
- Foam shows the weeds you sprayed
- See where you've sprayed (applied)
- See the weeds you (sprayed) (applied)
- See how much you've applied
- (Foam) Marks (shows) treated (sprayed) weeds (for up to 5 minutes)
- Visible foam marks (shows) weeds you've sprayed (treated) (for up to 5 minutes)
- Easy to see where (the weeds) (what) you've sprayed (treated) (applied)
- (Visible) Foam makes it easy to see the weeds you've sprayed (treated) (applied)
- Treated (sprayed) weeds stay marked for up to 5 minutes
- Treated (sprayed) weeds can easily be seen for up to 5 minutes
- Choose foam or clear stream (no foam)
- Accurate
- Visible Results
- See what you've hit
- Ideal for use in (flower and vegetable) gardens

Pull 'N Spray:

- Quick & Easy to Use
- EASY-TO-USE
- The easy way to spray
- No more squeeze, squeeze, squeeze
- No (constant) pumping
- No constant trigger squeezing
- No pumping just pull (and spray)
- (33%) More than 1 gallon size
- Precise control for maximum accuracy
- Refillable
- Consistent spray for maximum accuracy
- Continuous, adjustable spray
- Quickly covers large areas
- Fast and easy application
- Change the way you spray
- Great (Ideal) for large or small jobs (areas)

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- Precise control – sprays (targets) only what you want
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- You're (It's) always ready to spray
- The easy way to kill weeds
- ~~Save (Saves) time and energy~~
- One pull = (equals) (delivers) 34 trigger sprays
- New and Improved!
- Improved!
- Pull 'N Spray
- Give your hands a break
- Continuous spray
- Targeted spray
- Accurate
- Convenient

Pump 'N Go Sprayer

- (X%) More (than 1 gallon size)
- 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, adjustable spray
- Convenient (extendable wand)
- Cover more ground faster
- Easy to use tank sprayer
- EASY-TO-USE
- Extendable wand provides greater accuracy without bending over
- Fast and easy application (way to spray)
- Give your hands a break
- Great (Ideal) for large or small jobs (areas)
- Improved!
- It's always ready to spray
- Long(er) spray time with less pumping
- New and Improved!
- New!
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No Mix, No Mess
- No more pulling, just spray
- No more tired (aching) hands
- Now!
- Precise control – sprays (targets) only what you want
- Precise control for maximum accuracy
- Pump 'N Go Sprayer

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- (Provides) Up to (5, 10,15) minutes of continuous spray
- Quick & Easy to Use
- Quickly covers large areas
- Refillable Container
- Save(s) time and energy
- Targeted spray

- Targets weeds
- The easy (easier) way to spray (kill weeds)
- You're always ready to spray

Battery Operated Trigger Sprayer

- 33% More than 1 gallon size
- Adjustable spray (sprayer) nozzle for maximum control
- Adjustable spray pattern for maximum control
- Batteries included
- Battery Operated
- Change the way you spray
- Consistent spray for maximum accuracy
- Continuous spray
- Continuous, adjustable spray
- Convenient
- Easy to use tank sprayer
- EASY-TO-USE
- Fast and easy application
- Give your hands a break
- Great (Ideal) for large or small jobs (areas)
- It's always ready to spray
- New!
- No (constant) pumping
- No (More) Hand Fatigue
- No constant trigger squeezing (pulling)
- No more pumping, no more pulling, just spray
- No more tired (aching) hands
- Now!
- Power Sprayer (for large areas)
- Quick & Easy to Use
- Quickly covers large areas
- Save(s) time and energy
- Targeted spray
- The easy (easier) way to kill (spray) weeds
- The fast (-er) way to spray
- X% more (than 1 gallon size)
- You're always ready to spray

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APPENDIX 3 – Packaging Related Instructions

QUICK CONNECT SPRAYER DEVICE [illustrations]

1. Remove sprayer. Pull cord/tubing ALL THE WAY OUT.
2. Insert (color of plug) plug into spout on cap until it clicks.
3. Flip-up spout. (Open) Adjust nozzle (at-end of sprayer) to the desired spray setting (foam or spray).

(Alternate Text)

HOW TO USE

Pull Tubing Out

Insert Plug into Cap until it Clicks

Flip up Spout

PULL 'N SPRAY DEVICE [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.
- SLOWLY pull ring at bottom of sprayer handle until it stops (and hold for 2 seconds) to prime (ready) the sprayer.

Illustration #3

- Adjust nozzle (at the end of sprayer) to the desired spray setting (foam or spray).
- 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 continue spraying.

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

(Alternate Text)

HOW TO USE

Connect Hose.

Flip Up Spout

Pull Ring Slowly to Spray

[PUMP N' GO SPRAYER]

[insert illustrations]

HOW TO ASSEMBLE AND USE THE PUMP 'N GO SPRAYER

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.

EXTEND WAND *[Illustration #3]*

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,

PUMP *[Illustration # 4]*

4. Make sure the handle is screwed on TIGHTLY or the bottle will not pressurize. Pump container [X-X] times to pressurize bottle. A full bottle requires fewer pumps than an empty bottle. A full bottle requires fewer pumps than an empty bottle. Pumping to 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 the yellow button and push the wand until the yellow button snaps back into the original storage position. Place wand back onto the bottle with nozzle facing down.

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.

(Optional Text)

[insert sprayer instruction graphics]

Connect	Extend Push	Pump 15-20 times	Spray	Depressurize
				Retighten to Store

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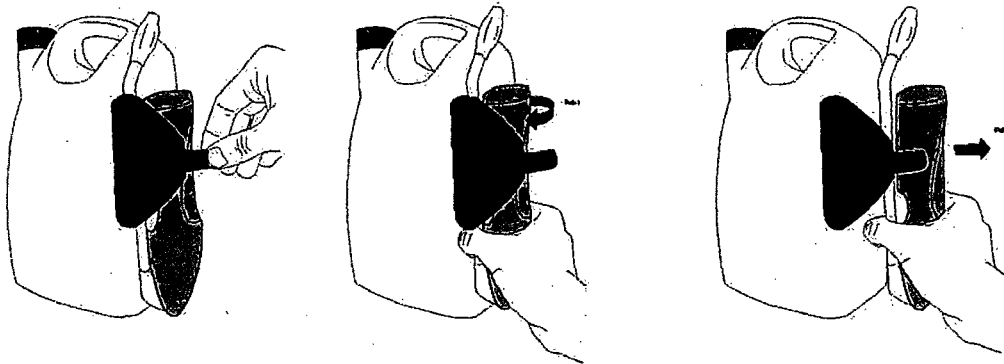
(Wand) STORAGE POSITION Push button and pull nozzle end. Extend to spray position. > SPRAY POSITION.

(Handle) (arrow graphic) RELEASE PRESSURE AFTER USE Push handle to cap & turn. RETIGHTEN.

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.

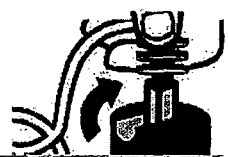
- Remove protective strip from battery compartment to activate batteries.



[Illustration #2]

2. Connect

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



[Illustration #3]

3. Extend

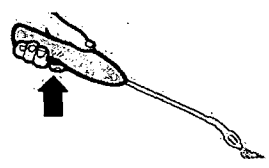
- Flip open wand [applicator name] until it clicks and locks into position.



[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.

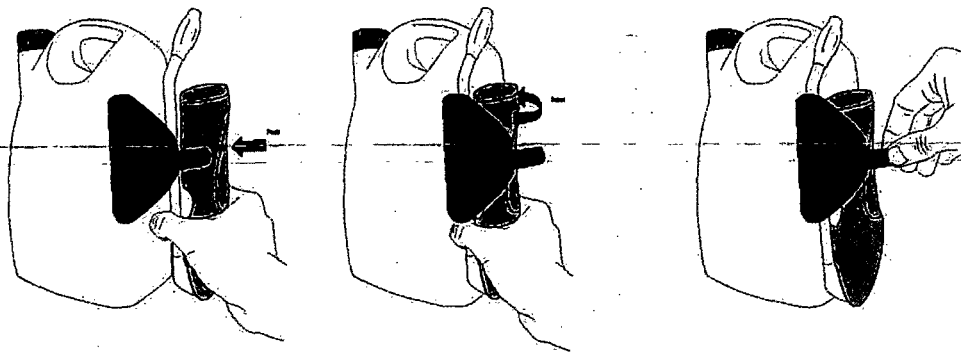


[Illustration #5]

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.

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.



Push

Twist

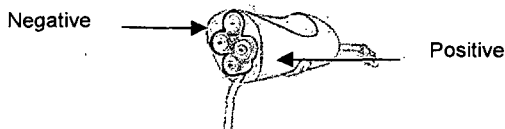
Lock

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.



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
- 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.

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- 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.
-

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:

Problem: Sprayer does not spray [function].

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].

Possible Cause: Nozzle is turned Off.

Solution: Turn nozzle to [desired] spray setting [position].

Possible Cause: [Color of plug] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks and flip up spout.

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime the sprayer.

Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].

Possible Cause: Weak batteries.

Solution: Install a fresh set of alkaline batteries.

Possible Cause: [Color of plug] plug at end of hose is not flipped up.

Solution: Insert [color of plug] plug at end of hose into [color of spout] spout on cap until it clicks. [Attach coupler to the cap] and flip up spout.

Possible Cause: Nozzle not fully open.

Solution: Turn nozzle to [desired] spray setting [position].