



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 15, 2017

Tracey Angel
Regulatory Affairs Analyst
The Hawthorne Gardening Company
800 Port Washington Blvd.
Port Washington, NY 11050

Subject: Pesticide Registration Improvement Act (PRIA) Labeling Amendment – to add efficacy data in support of certain uses/claims on label and change label to eliminate certain alternate brand names, correct directions for use and revise marketing claims.
Product Name: NNS 79766
EPA Registration Number: 91161-1
Application Date: June 23, 2017
OPP Decision Number: 531147

Dear Ms. Angel:

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

The alternate brand names Whitney Farms Pelargonic Salt Weed & Grass Killer, Whitney Farms Pelargonic Salt Weed & Grass Control, Whitney Farms Pelargonic Salt Grass & Weed Control, and Whitney Farms Pelargonic Salt Grass & Weed Killer have been removed from the registration, and our records have been updated accordingly. This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 § CFR 152.3.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims

Page 2 of 2
EPA Reg. No. 91161-1
OPP Decision No. 531147

made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Cheryl Greene by phone at (703) 308-0352 or via email at greenec Cheryl@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Bryceland". The signature is fluid and cursive, with the first name being the most prominent.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

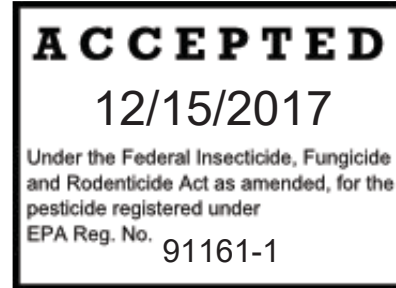
Enclosure – Stamped Label

Bold, italicized text is information for the reader and is not part of the label.
[Bracketed information is optional text.] Text separated by / denotes and/or options.
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EPA File Symbol 91161-1

NNS 79766

[Ready-To-Use]



Active ingredient:	wt%
Ammonium Nonanoate5.0
Other ingredients.95.0
Total	100.0

NNS 79766 contains 0.42 lbs. of ammonium nonanoate per U.S. gallon

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back [panel/label/booklet] for additional precautionary statements

Manufactured for/Produced for/Sold By/Distributed By:
The Hawthorne Gardening Company
800 Port Washington Blvd.
Port Washington, NY 11050

EPA Reg. No.91161-1
EPA Est. No. XXXXXX
[Superscript is first letter of lot number]

Alternate Brand Names

Whitney Farms Weed & Grass Control
Whitney Farms Weed & Grass Killer
Whitney Farms Grass & Weed Control
Whitney Farms Grass & Weed Killer

Net Contents: 24 fl oz (709 ml) , XX fl oz (X ml), XX gal (X L)

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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 the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<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 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 or doctor for treatment advice.
EMERGENCY NUMBER	
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE, CALL 1-866-541-3114	
Have the product container or label with you when calling a poison control center or doctor.	
[This product is identified as [Insert Brand Name], EPA Reg. No. [Insert EPA Reg. No.].]	

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Harmful if inhaled. Causes moderate eye irritation. Avoid breathing spray mist. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

For terrestrial uses: This pesticide is toxic to fish and aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, or gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
[Always read and follow label directions.]

For residential [outdoor] use only.

Do not apply this product in a way that will contact people or pets, either directly or through drift.

RESTRICTIONS/PRECAUTIONS:

- Do not allow spray to contact desirable plants unless topical injury can be tolerated.
- Do not allow children and pets to enter application area until sprays have dried.
- Not for food use plants.
- Do not apply to hardscapes, only apply directly to weeds growing in these areas.
- Do not apply to weeds when wet from dew, rain or irrigation.
- Do not irrigate within 2 hours after application
- Do not apply if rainfall is expected within 2 hours.
- No shaking or agitation is required.

Product Application Instructions

NOTE TO PM: For all Options below Graphics illustrating a step or group of steps may appear on final printed label

Option 1: Conventional Trigger Small RTU

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE/APPLY:

[Spray]

1. Turn/Adjust sprayer nozzle to desired spray [setting].
2. Squeeze trigger [repeatedly to spray].

[Finish]

1. Turn sprayer nozzle to “OFF” / X.]

Option 2: Conventional Trigger Large RTU

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE/APPLY *Alternative Text:* [HOW TO ASSEMBLE AND USE INSTRUCTIONS]:

[Spray]

1. Remove sprayer from bottle [by sliding/pulling sprayer up].
2. [Unwrap/uncoil/extend hose and/ Pull cord/tubing all the way out and] insert [color] hose connector/plug into [color] spout/knob/opening/lid on [bottle] cap [until it clicks].
3. Flip up [color] spout until fully upright / Twist/Turn spout/lid/cap/knob to “ON” / Pull spout/lid/cap up.
4. Turn/Adjust sprayer nozzle to desired spray [setting].
5. Squeeze trigger repeatedly to spray.

[Finish]

1. Turn sprayer nozzle to “OFF”/X.
2. DO NOT Disconnect hose connector from spout/cap/lid/opening
3. Place sprayer back into holster/holder/side clip.]

Option 3 - Pull ‘N Spray® II

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE/APPLY *Alternative Text:* [HOW TO ASSEMBLE AND USE INSTRUCTIONS]:

[Spray]

1. Remove sprayer from holster/holder.
2. [Unwrap/uncoil/extend hose and] insert [color] hose connector into [color] spout/knob/opening/lid on [bottle] cap [until it clicks].
3. Flip up [color] spout until fully upright / Twist/Turn spout/lid/cap/knob to “ON”/ Pull spout/cap/lid up.
4. Turn/Adjust sprayer nozzle to desired spray [setting].
5. Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
6. Press trigger to spray.

[Finish]

1. Turn sprayer nozzle to “OFF”/X.
2. DO NOT Disconnect hose connector from spout/cap/lid/opening
3. Place sprayer back into holster/holder/side clip.]

Optional:

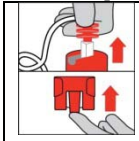
Refill/Reuse Directions

[The Pull ‘N Spray II/Applicator Name [applicator/sprayer/wand] may be reused with the available NNS 79766/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.]

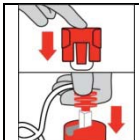
Refill/Reuse Directions

How to attach the [Pull 'N Spray II/Applicator Name] [applicator/sprayer/wand] to NNS 79766/Product Name [refill bottle]:

Remove [color] hose from original bottle/container:



[To remove the side holster/holder/clip from original bottle/container, pull/lift the bottom tab underneath and slide the holster/holder/clip up.]



[Attach the sprayer holster/holder to [Product Name] refill bottle/container by sliding the holster/holder/clip down onto the knob.]



Insert [color] hose connector into [color] spout/lid/knob/opening on cap until it clicks.

Option 4 – Battery Powered Wand/Comfort Wand/Extended Wand

[[Applicator Name] [Applicator/Wand] Directions]

HOW TO USE/APPLY *Alternative Text*: [HOW TO ASSEMBLE AND USE INSTRUCTIONS]:

[Prep [Wand]]

1. Remove sprayer [wand/Applicator Name] from holster/holder/side clip. [Unsnap holder/Twist left/Pull]
2. [Remove [color] pull strip/protective strip [from battery compartment] to activate batteries].
3. [Pull connector by slightly twisting from holder and unwrap hose completely.]
4. Unfold/Flip-open [Applicator Name] / [wand] until it clicks/locks into position.

[Connect]

1. [Unwrap/uncoil/extend hose and] insert [color] hose connector/plug [at end of hose] into [color] spout/lid/knob/opening on [bottle] cap until it clicks.
2. Flip up [color] spout until fully upright. / Twist/Turn spout/cap/lid/knob to “ON”. / Pull spout/cap/lid up.

[Spray]

1. Turn/Adjust [sprayer] nozzle to desired spray [setting].
2. [Slide [color] switch on trigger to “Unlock”/the unlocked position [illustration]].
3. Press trigger to spray. ***Alternative Text***: [Point [wand/insert applicator name] nozzle away from body and hold trigger for continuous spray.]

[Finish]

- Turn nozzle to “OFF”/X.
- [Slide [color] switch on trigger to “Lock” [illustration]]. ***Alternative Text***: [Engage trigger lock.]
- Fold [Applicator Name] wand closed and place sprayer back in holster/holder/side clip.]

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

[To replace batteries: See marked diagram inside battery compartment. ***Alternative Text***: [Open battery compartment at bottom of [wand/ Insert Applicator Name]. Remove used batteries and replace with [Insert #] new [AA/ alkaline] batteries [in correct position as marked inside battery compartment]. Securely close battery compartment door. 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.]

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

Troubleshooting Tips:

Problem: Sprayer does not spray [function].

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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: Sprayer nozzle is turned Off.

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

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks and flip up spout until fully upright.

Possible Cause: Sprayer is not primed.

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

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

Possible Cause: Weak batteries.

Solution: Install fresh set of batteries.

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks. [Attach coupler to the cap] and flip up spout until fully upright.

Possible Cause: Sprayer nozzle not fully open.

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

End of Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand]

Optional Applicator Transfer to Refill Bottle Directions:

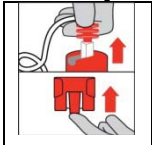
Refill/Reuse Directions

[The Comfort Wand/Applicator Name [applicator/sprayer/wand] may be reused with NNS 79766/Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.]

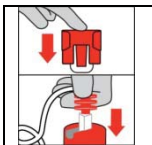
Refill/Reuse Directions

How to attach the [Comfort Wand/Applicator Name] [applicator/sprayer/wand] to NNS 79766/Product Name [refill bottle]:

Remove [color] hose connector from original bottle/container:



[To remove the side holster/holder/clip from original bottle/container, pull/lift the bottom tab underneath and slide the holster/holder/clip up.]



[Attach the sprayer holster/holder/clip to [Product Name] refill bottle/container by sliding the holster/holder/clip down onto the knob.]

Insert [color] hose connector into [color] spout/knob/opening on cap until it clicks.

Optional Pour Refill into RTU bottle Refill Directions:

Refill text for Refill Container:

Refill/Reuse Directions

[How to Refill: Do not reuse or refill this container. Use this product to refill the empty [EPA Reg. No. 91161-1: NNS 79766] container by pouring product carefully and directly into the container. DO NOT add water. Do not refill [EPA Reg. No. 91161-1] with any other product.]

Or:

[Use this product to refill the empty [insert brand name for 91161-1: NNS 79766] container by pouring product carefully and directly into the container. DO NOT add water.]

RTU Label: For Ready-To-Use Containers with Applicators Intended to be Reused/Refilled

Refill/Reuse Directions

[HOW TO REFILL

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.]

Option 5 – Squeeze

[[Applicator Name] [Applicator/Wand] Directions]

HOW TO USE/APPLY *Alternative Text*: [HOW TO ASSEMBLE AND USE INSTRUCTIONS]:

Open:

- [Twist off cap and remove foil liner.]
- [Replace cap.]
- Flip/Twist/Open Cap

Spray:

- To BEGIN spraying, invert the bottle and point/aim/direct [at the weed/or area of application]
- Squeeze the bottle [to initiate the flow of product.]
- Spray only until the surface [of the weed] is wet. / Spray evenly

[Finish:]

- To STOP spraying, [release pressure] [turn bottle upright]
- Flip/twist/close the cap [until you hear an audible snap] [until secure].

METHODS OF USE AND GENERAL APPLICATION INSTRUCTIONS

[General Instructions/How It Works]:

Ammonium Nonanoate is the primary ingredient and is formulated to kill any plants/weeds that are green and growing. This simple formula works to kill only what you see where you sprayed. Weeds will turn brown within hours. Perennial or more established weeds may take multiple applications. For best results, re-apply product every 2 to 3 weeks.

And/or

[NNS 79766/This product is a contact, non-selective herbicide for spray application only to undesirable plant growth. Do not allow spray to contact any green plant parts of desirable plants. NNS 79766/This product provides control and burndown suppression of annual and perennial broadleaf and grass weeds. Mosses and liverworts are also controlled. The amount of burndown and the duration of weed suppression may be reduced when weeds are under environmental stress or large in size].

And/or

[NNS 79766/This product is a non-volatile and water soluble herbicide for foliar application to weeds. Complete and uniform coverage of weeds by the spray solution is required for the best weed control. Plant foliage will change from a green color to brown/black within one to two hours after spray application. NNS 79766/This product's effect on plant tissue may be more rapid in warm weather than in cold conditions. However, weed control is normally unaffected by temperature.]

And/or

[NNS 79766/This product is a herbicidal soap product which penetrates the cell walls of plants to disrupt the intracellular organization and compartmentalization of physiological functions by membranes within the cell walls. Plant growth ceases when cellular contents are mixed and brown necrotic plant tissue is formed.]

NNS 79766/This product does not migrate through the soil and is not translocated in plants. **To ensure satisfactory control, plant leaves must be thoroughly and uniformly covered with the spray solution. NNS 79766/This product** does not provide any residual weed control in soil to affect germinating weed seeds.[This is a vegetative burndown spray for control of broadleaf weeds and grasses.] [For best results, apply NNS 79766 / this product when weeds are small.]

Use [Application] Instructions/How To Apply/Use:

NNS 79766/This product is completely soluble in water. No shaking or agitation is required.

[During application, some foaming may occur; however, weed control is not reduced if the foam is deposited on the plant surface and is not blown away as drift].

WHERE TO USE/APPLY

- For outdoor use only.
- Use on walkways, driveways, under trees and in landscape beds.

HOW TO USE/APPLY

- [Adjust nozzle to the desired spray setting].
- Apply/spray until weeds are completely covered/run-off from weed leaves occurs.
- Apply to dry weed surfaces only.
- Use a cardboard or plastic shield to block spray from contact desirable plants nearby. If desirable plants are accidentally sprayed, rinse off immediately with water.
- Difficult to control weeds may require several applications for complete control.

WHEN TO USE/APPLY

- Apply any time of year when weeds are small [3 inches tall or wide] and actively growing.
- Apply when winds are calm.

IMPORTANT: Do not spray plants or grasses you like - they will die. Not recommended for spot weed control in lawns since this product kills lawn grasses. Do not allow treated weeds to come in contact with desirable plants until spray has dried.

Note To PM: *The following text up to the weeds controlled list is an Alternate/Optional How to Use/Apply to the above text*

[How To Apply]

Hand-Held Spray Application

Spray weeds until all leaf surfaces are covered. The number of weeds present, leaf shape, weed size and weed species will affect spray coverage.

Thorough saturation of the foliage and stems is required for control. Apply sprays until run-off from weed leaves occurs. Use low spray pressure to reduce foaming and avoid contact with desirable plants.

And/Or

Directed Spray Application

Use a shielded sprayer to prevent spray contact on desirable plants. Avoid spray contact with green plant stems or green bark of young trees and shrubs. Some visible foam may appear on the leaves as the plants are sprayed. Overspray or drift onto desirable plants is usually not a serious problem because leaves and stems require a thoroughly wet spray coverage for significant injury. Repeat applications as often as necessary to obtain desired control.

Use Methods/How To Use

Determine the weed control situation and select the use method required as follows:

A. Vegetative Burndown: Broadcast spray before no-till planting or seedbed preparation to control weeds prior to seeding or transplanting. Spot sprays may be used in and around gardens and landscape plants/ornamentals.

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B. Directed and shielded sprays: Use spray nozzle type, or configuration for directed spray, or a shield placed around the nozzle to prevent spray contact on the foliage or green stems or bark. Use directed/shielded spray applications to area between plastic mulch strips and staked crops for weed control.

- I. Weeds controlled or suppressed by NNS 79766/This product:

Broadleaf Weeds:

Algae

Bittercress, hairy

Chickweed, common

Chickweed, mouse-ear*

Cocklebur, common

Corn spurry

Cudweed, purple

Groundsel

Lambsquarters, common

Liverwort

Marestail or Horseweed rosettes

Morningglory, annual

Moss

Mustards

Oxalis or Woodsorrel

Pansy, wild

Plantain*

Pigweed, smooth and redroot

Mallow, roundleaved

Moneywort

Shepherdspurse

Sorrel, sheep

Spurge, spotted

Field pennycress

Velvetleaf

Grass and Other Weeds:

Bentgrass, colonial*

Bluegrass, annual

Crabgrass, large

Fescue, creeping red*

Fescue, hard*

Nimblewill*

Onion, wild*

Ryegrass, perennial*

Star-of-Bethlehem

II. Weeds Moderately Difficult to Control

Bermudagrass (Wireweed)*

Dandelion*

Nutsedge, yellow*

Ragweed, common*

*multiple applications may be required for control

Note to reviewer: Below is Storage & Disposal For Option 1, Conventional Trigger Small RTU, and Squeeze

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note to reviewer: Below is Storage & Disposal For Options 2, 3 and 4 - Conventional Trigger large RTU, Pull 'N Spray® II & Battery Powered Wand/Comfort Wand

Refill Version

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Applicator Name/This product can be reused with Product Name refill bottle/container. Follow instructions in the Reuse/Refill Directions when reusing [applicator name]/refilling this 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Non-Refill Version

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Warranty/Disclaimer Statement

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility of risks of use, storage or handling of this product not used in accordance with directions.

MARKETING/ADVERTISING CLAIMS

(claims may appear on any or all label panel(s))

Product Efficacy/Mode of Action Claims

1. Acts on contact.
2. Acts on contact – see results in 15 minutes
3. Visible results within 24 hours
4. See results within one to two hours

5. FOR CONTACT SPRAY CONTROL OR BURNDOWN OF WEEDS AND GRASSES
6. Controls/Kills [Any of the weeds or grasses from list] and many others*
7. Kills/Controls all types of weed and grasses
8. For control or burndown of weeds and grasses [by/through contact].
9. For control or burndown of a broad spectrum of weeds, grasses, and mosses [by/through contact]
10. For control or burndown of a broad spectrum of weeds by/through contact.
11. For non-selective control of herbaceous broadleaf weeds and grasses
12. Formulated to effectively kill any plants/weeds that are green and growing
13. Spray the weed's leaves for control or burndown of weeds and grasses
14. Does not have soil activity
15. Kills existing weeds only, no residual activity in soil
16. Does not translocate
17. Absorbed into both broadleaf and grassy weeds
18. Absorbs on contact, starts working immediately
19. *see booklet for complete list

General & Product Facts

20. Non-selective Herbicide
 21. Non-residual Herbicide
 22. Does not leach through soil to affect desirable plants.
 23. Grass and weed knockdown.
 24. Controls annual and perennial weeds.
 25. Controls grasses and broadleaf weeds
 26. For control of unwanted vegetation
 27. Weed and Grass Killer
 28. Broad Spectrum
 29. Will not leach through soil to harm desirable plants
 30. Effective weed and grass control
 31. Eliminates vegetation and leaves area weed free
 32. For non-selective control of weeds and grasses. Do not spray in lawn
 33. Above ground weed killer/control
 34. Un-safe for weeds
 35. Kills/Controls the weeds you see
 36. Rainproof/Rain fast in 2 hours*
 37. Works with temperatures as low as 40 degrees F**
 38. Kill/Control weeds effectively
 39. Will not [migrate/move] through soil to harm surrounding plants of future growths
 40. Water-soluble
 41. Non-volatile
- *upon drying
** activity may be slower at cooler temperatures

Organic Gardening

42. FOR ORGANIC GARDENING
43. OMRI Logo

Use Areas

44. FOR HOMES AND GARDENS
45. For weed control in and around the home and gardens.

46. Ideal for spot weed control around ornamental trees, bushes, flowers and landscaping beds.
 47. Ideal for weed control along walkways and driveways.
 48. Ideal for trimming and edging along walkways, driveways, trees and landscaping beds
 49. For weed control in and around the home and gardens.
 50. For Home Garden/Landscape Care
 51. For Home [Garden/Landscape] Use [only]
 52. [For Home/Residential] Outdoor use [only]
 53. [Formulated] for [outdoor] residential use [only]
 54. Intended for residential use
 55. Use on landscape beds, around garden plants and around play areas.
 56. Use on patios, driveways, walkways and sidewalks*
 57. Use directly on weeds on patios, driveways and sidewalks
 58. [Product Name] kills weeds and grasses in – Patios – Driveways – Sidewalks – Ornamental Gardens and other non-lawn areas.
 59. Approved for use in vegetable gardens
 60. Weed free patio/hardscapes/pavers/Fence Lines/ Along Fences Driveways & Walkways/ Patios/Tree Rings/ Around Trees/Flower Beds/ Landscaped Beds/ Vegetable Gardens/Edging]
- *Apply directly to weeds.

Other Product Claims

61. Takes the guesswork out of weed control [in the garden/landscape]
62. Weed control for your garden/landscape
63. Weed control made easy
64. Be in control of weeds in your garden/landscape
65. Before [illustration] / After [illustration]
66. For a beautiful [weed free] garden/landscape
67. [For] [Get] a weed free garden/landscape
68. From the garden care experts at [Company Name]
69. From the leader in weed control
70. From the weed experts at [Company Name]
71. Help[s] [keep[s]] the garden/landscape look[ing] beautiful
72. Helps keep gardens/landscapes weed free
73. People & Pets may enter treated areas after spray has dried.
74. Say so long to unruly grass and weeds
75. Draw the line™
76. No more hand pulling [weeds]
77. Be smarter than your weeds
78. Eliminate unwanted vegetation
79. Overspray won't/Does not stain brick, concrete or pavement
80. Use with confidence in gardens and landscapes

Coverage Claims

81. [A] 24 oz bottle will cover(s)/treats up to 56 sq ft
82. [A] 32 oz bottle will cover(s)/treats up to 75 sq ft
83. [A] 1 gal bottle will cover(s)/treats up to 300 sq ft
84. [A] 1.33 gal bottle will cover(s)/treats up to 400 sq ft
85. [A] X oz/gal bottle will cover(s)/treats up to X sq ft

Ready To Use Claims

86. [Requires] no measuring, [no mixing]

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87. Convenient because it is premixed
88. No Mixing [necessary]
89. No mixing, no measuring, no mess
90. Ready-To-Use
91. Do NOT add water
92. No Mix formula
93. No Mix(ing), No Mess
94. No shaking required
95. Is ready-to-use with no mixing or shaking required
96. No measuring

Applicator Claims

97. No messy clean-up
98. Hands stay dry
99. One-handed operation [use] [spraying]
100. [The] Easy way to spray
101. [Ergonomic] [Comfort] grip [handle]
102. Ready-To-Use®/Ready To Use/Applicator name
103. [Applicator name]
104. Convenient [simple] design
105. Easy [and simple] to use
106. Quick & Easy [to use]
107. Save[s] time [and energy]
108. No Spreading – No complicated mixing
109. The fast, easy way of weed control
110. Easy To Use spray application/nozzle
111. Ready to use spray nozzle
112. Easy-To-Use
113. No Mess
114. Powered by Duracell/Battery Brand [batteries]
115. Power Up with Duracell/Battery Brand [batteries]
116. [Battery Brand] batteries included
117. Twist Cap
118. Accurately target(s) what/the weeds you want to spray/kill
119. Adjustable spray(er) nozzle/pattern for maximum control
120. Change the way you spray
121. Convenient [to use]
122. Fast and Easy Application/Way to Spray
123. Give your hands a break
124. Handy
125. It's always ready to spray
126. Improved [Applicator/Application/Device/System]!
127. No leaks or mess
128. Pre-mixed, pre-measured, easy-to-use
129. Easy to store*

*See back for instructions

Promotional Claims

130. Bonus [value/ size/offer/package/pack/buy]

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131. Value [pack/ size/buy]
132. Exclusive item [size]
133. Special [buy/offer/size/item]
134. Limited time offer
135. X% more than X size
136. Save [money]
137. Free sample
138. X% more [free]
139. Great value
140. XX% more than X gallon size
141. X bottles [included]
142. X refill(s) [included/attached]
143. \$X rebate
144. A \$X value
145. Bundle/Club/Combo pack
146. Not for individual sale
147. Sample not for sale
148. Save up to \$X on [your] next purchase

Booklet Text

149. Peel Open for use directions and further information
150. OPEN
151. Resealable Label for Directions & Precautions
152. Peel Open for use directions and further information
153. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
154. PEEL HERE / PRESS TO RESEAL

OTHER

155. New/Now (this claim may appear on any label panel for 6 months following commercial introduction).
156. XX% less plastic* * vs. previous packaging
157. [Company] & Your Environment – Your yard is a place to enjoy. That’s why [company] products are designed with care to provide effective solutions to weed problems. Please follow instructions for appropriate usage, storage and disposal.
158. [Brand Name] Family of Product : Visit the [Brand Name] website to learn more about the [Brand Name] family of products for the best solution to your toughest weed problems.
159. Read Entire label before use
160. [Recyclable symbol]
161. Made in U.S.A.
162. Manufactured In/Produced In/Assembled In/ Product of [the] USA/Insert Country
163. ©20XX, licensed by [Company/Brand]. World rights reserved.
164. QUESTIONS OR COMMENTS - [phone icon] 1-800-xxxxxxx www.xxxx.com [Visit our website] [computer icon]
165. Questions, Comments or Information [insert phone & computer icons] [insert telephone number] [insert website]
166. [Insert relevant trademark statement(s)]
167. [Insert relevant patent information statement(s)] [For a list of patents, if any, covering this product or its use, please go to [insert patent website]
168. [This bottle [may] contain[s] an anti-theft device [, either inside or on the back of the bottle]. [It does not affect product performance.]]

Guarantees:

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- 169. Guaranteed+++
- 170. [Company/Brand] Guarantee[d] +++
- 171. Guaranteed [results] +++
- 172. [Company/Brand] Satisfaction guaranteed[+++]
- 173. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]
- 174. Guaranteed Satisfaction+++
- 175. Consumer Guarantee+++
- 176. +++ [Company/Brand] Promise: If this [company/brand] product when used for the intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.
- 177. +++The [Company/Brand] Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.
- 178. +++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.

Note To PM: The following Product Facts format is optional and the information may appear inside or outside of a box. Appropriate formula and company specific information will be inserted on Final Printed Label to replace “X”

PRODUCT FACTS	
KILLS/CONTROLS WEEDS	<i>[optional illustration]</i> Note To PM – Any weeds or grasses from the label may appear and the list would end with “and others/many others/other weeds & grasses”
WHERE TO USE/APPLY	<i>[optional illustration]</i> For outdoor use only. Use on walkways, driveways, under trees and in landscape beds
HOW TO APPLY/USE <i>[optional illustration / trigger sprayer]</i>	<ul style="list-style-type: none"> • Apply when weeds are small [3 inches tall or wide] and actively growing. • Apply/spray until weed are completely covered/run-off from weed leaves occurs • Apply to dry weed surfaces only. • Apply when winds are calm. • Use a cardboard or plastic shield to block spray from contact desirable plants nearby.
[WHEN TO APPLY/USE]	Apply when weed or grasses are first seen and are small

Note to PM: The following is an optional graphics wheel or similar layout with Where To Use, What To Know and How To Use components

[DID YOU KNOW?] [Insert Claims from Above]

WHERE TO USE [Insert Graphics]

- [Fence Lines/ Along Fences]
- [Driveways & Walkways/ Patios*]
- [Tree Rings/ Around Trees]
- [Flower Beds/ Landscaped Beds]
- [Vegetable Gardens]
- [Edging]

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*Apply directly to weeds

WHAT TO KNOW [Insert Graphics]

- [See results within one to two hours]
- [Insert Claim from Above]

HOW TO USE [Insert optional Graphics] ***Select applicable packaging type below***

Battery Powered Wand/Comfort Wand [Insert Graphics]

Connect hose

Extend [Wand/ Insert Applicator Name]

Twist Nozzle [and/ &] Spray [weeds]

Pull 'N Spray [Insert Graphics]

Connect Hose

[Flip up spout/ Flip up [Insert Color] spout until fully upright/ [Turn/ Twist] [spout/knob] to ON/ Pull spout up]

Pull ring slowly

Let go & spray weeds

Conventional Trigger Large RTU [Insert Graphics]

Pull tubing out

Insert into cap

[Flip cap up/ Flip up spout/ [Turn/ Twist] [spout/knob] to ON/ Pull spout up]

Adjust [spray] nozzle [and/&] Spray [weeds]

Refill Containers [Insert Graphics]

Pour refill into [empty/ Insert Packaging Type] container

[or] [Connect/ Reuse/ Transfer] [Insert Applicator Name/ Wand] [on/ to/ this] [Container/ Bottle]

Do NOT add water [Picture of Droplet]

Conventional Trigger Small RTU [Insert Graphics]

Adjust [spray] nozzle

Spray weeds [you want to kill]