



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 16, 2021

Mr. Shannon Whitlock  
Regulatory Specialist  
Dow AgroSciences LLC.  
9330 Zionsville Road  
Indianapolis, IN 46268

Subject: Registration Review Label Mitigation for Pyroxsulam  
Label Amendment – Revised use rate on wheat  
Product Name: Simplicity  
EPA Registration Number: 62719-568  
Application Date: September 15, 2020 and February 9, 2021  
Decision Numbers: 567288 and 570673

Dear Mr. Whitlock:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Pyroxsulam Interim Decision, and has concluded that your submission is acceptable. The agency also completed review of your amended label referred to above, submitted in connection with registration under FIFRA, as amended, and has determined the label is also acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency 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.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

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Decision No. 567288 and 570673

If you have any questions about this letter, please contact BeWanda Alexander by phone at (703)347-0313, or via email at [alexander.bewanda@epa.gov](mailto:alexander.bewanda@epa.gov).

A handwritten signature in black ink, appearing to read "Erik Kraft". The signature is written in a cursive, flowing style.

For

Erik Kraft, Product Manager 24  
Fungicide and Herbicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

(base label)

PYROXSULAM	GROUP	2	HERBICIDE
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**Simplicity®**

[Alternate Brand Name: Simplicity® CA]

**Herbicide**

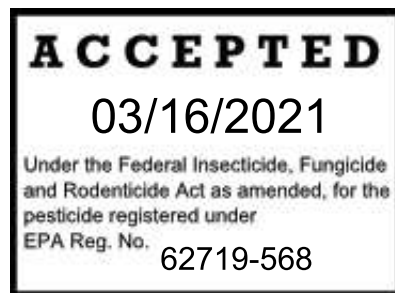
## ACTIVE INGREDIENTS:

PYROXSULAM:.....2.87%  
 Other Ingredients.....97.13%  
 Total.....100.00%

Contains petroleum distillates.

Equivalent to 0.25 lb per gallon or 30 g per liter of pyroxsulam.

Warning, contains the allergen soy.

**Keep Out of Reach of Children****WARNING/AVISO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you **DO NOT** understand the label, find someone to explain it to you in detail.)

**FIRST AID**

**IF SWALLOWED:** Call a poison control center or doctor immediately for treatment advice. **DO NOT** induce vomiting unless told to do so by a poison control center or doctor. **DO NOT** give any liquid to the person. **DO NOT** give anything by mouth to an unconscious person.

**IF ON SKIN OR CLOTHING:** 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:** 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 further treatment advice.

**IF IN EYES:** Hold eyes 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. Call a poison control center or doctor for treatment advice.

**NOTE:** When seeking medical attention, take the container label if at all possible. If not, take information which identifies the product, that is, the product name and registration numbers - In case of emergency endangering health or the environment involving this product call 1-800-992-5994.

**TOXICOLOGICAL INFORMATION**

No specific antidote. Employ supportive care. Treatment should be based on judgment of the physician in response to reactions of the patient. This product contains petroleum distillates. Vomiting may cause aspiration pneumonia.

**Precautionary Statements****Hazards to Humans and Domestic Animals**

**EYE AND SKIN IRRITANT**  
**POTENTIAL DERMAL SENSITIZER**

Harmful if swallowed. • Causes eye and skin irritation • Harmful if inhaled • **DO NOT** get in eyes or on skin • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals.

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

## Personal Protective Equipment (PPE)

### Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Barrier Laminate or Viton gloves
- Shoes plus socks
- Protective eyewear

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. **DO NOT** reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

## Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

## User Safety Recommendations

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

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## Storage and Disposal

Store in original container in a secure, dry, heated storage. This product will freeze at 14°F/-10°C. **DO NOT** store below 16°F/-9°C. Allow product to warm above 45°F/7°C before using and thoroughly mix the product prior to use. **DO NOT** contaminate food, feedstuffs or domestic water supplies.

**Pesticide Storage:** Store in original container only. **DO NOT** store below 16°F. Allow product to warm above 45°F before using and thoroughly mix the product prior to use.

**Pesticide Disposal:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### Nonrefillable containers 5 gallons or less:

**Container Handling:** Nonrefillable container. **DO NOT** reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

**Refillable containers 5 gallons or larger:**

**Container Handling:** Refillable container. Refill this container with pesticide only. **DO NOT** reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

**Nonrefillable containers 5 gallons or larger:**

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Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

**Refer to inside of label booklet for additional precautionary information and Directions for Use.**

**Notice:** Read the entire label. Use only according to label directions. **Before using this product, read "Warranty Disclaimer," Inherent Risks of Use," and "Limitation of Remedies" at end of label booklet. If terms are unacceptable, return at once unopened.**

In case of emergency endangering health or the environment involving this product call 1-800-992-5994.

Agricultural Chemical: **DO NOT** ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-568

EPA Est. \_\_\_\_\_

™® Trademarks of Corteva Agriscience and its affiliated companies.

**Produced for  
Corteva Agriscience LLC  
9330 Zionsville Road  
Indianapolis, IN 46268**

**NET CONTENTS \_\_\_\_\_**

(cover/shipping label)

PYROXSULAM	GROUP	2	HERBICIDE
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**Simplicity®**  
[Alternate Brand Name: Simplicity® CA]  
**Herbicide**

ACTIVE INGREDIENTS:  
PYROXSULAM:.....2.87%

Other Ingredients.....	97.13%
Total.....	100.00%

Contains petroleum distillates.  
 Equivalent to 0.25 lb per gallon or 30 g per liter of pyroxsulam.  
 Warning, contains the allergen soy.

**Keep Out of Reach of Children**  
**WARNING/AVISO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you **DO NOT** understand the label, find someone to explain it to you in detail.)

**Agricultural Use Requirements**  
 Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. Refer to the label booklet under "Agricultural Use Requirements" in the Directions for Use section for information about this standard.

**Refer to inside of label booklet for additional precautionary information including First Aid and Directions for Use.**

**Notice:** Read the entire label. Use only according to label directions. **Before using this product, read "Warranty Disclaimer," Inherent Risks of Use," and "Limitation of Remedies" at end of label booklet. If terms are unacceptable, return at once unopened.**

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**Indianapolis, IN 46268**

**NET CONTENTS** \_\_\_\_\_

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## Precautionary Statements

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### Hazards to Humans and Domestic Animals

## WARNING/AVISO

### POTENTIAL DERMAL SENSITIZER EYE AND SKIN IRRITANT

Harmful if inhaled • Harmful if Swallowed • Causes eye and skin irritation • **DO NOT** get in eyes or on skin • Prolonged or Frequently Repeated Skin Contact May Cause Allergic Reactions in Some Individuals

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

### Personal Protective Equipment (PPE)

#### Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Barrier Laminate or Viton gloves
- Shoes plus socks
- Protective eyewear

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. **DO NOT** reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

### User Safety Recommendations

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

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

### Environmental Hazards

**GROUND WATER ADVISORY:** This chemical has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

**SURFACE WATER ADVISORY:** This product may impact surface water quality due to the runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water.

This product is classified as having high potential for reaching surface water via runoff for several weeks after application.

A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of pyroxsulam from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours.

**NON-TARGET ORGANISM ADVISORY:** This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

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### Directions for Use

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It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

**DO NOT** apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your state or tribe, consult the agency responsible for pesticide regulation.

### Agricultural Use Requirements

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on the label about personal protective equipment, restricted-entry interval, and notification to workers (as applicable). The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

**DO NOT** enter or allow worker entry into treated areas during the restricted entry interval (REI) of 24 hours.

For early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear:

- Coveralls
- Barrier laminate or viton gloves)
- Shoes plus socks
- Protective eyewear

### Storage and Disposal

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into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

**Refillable containers 5 gallons or larger:**

**Container Handling:** Refillable container. Refill this container with pesticide only. **DO NOT** reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

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**Product Information**

Use Simplicity® herbicide as a postemergence herbicide for the control of annual grass and broadleaf weeds in wheat (including durum) and triticale.

Simplicity rapidly stops growth of susceptible weeds. However, typical symptoms (discoloration) of controlled or suppressed weeds may not be noticeable for 1 to 2 weeks after application, depending upon growing conditions and weed susceptibility. Degree of control and duration of effect are dependent upon weed sensitivity, weed size, crop competition, growing conditions at and following treatment, and spray coverage.

**Product Precautions**

When applying this product in tank mix combination, follow all applicable use directions, precautions, and limitations on each manufacturer's label.

## Product Restrictions

CROPS	Maximum Oz of Product/ Acre/ Single Application	Maximum Lb AI/ Acre/Single Application	Maximum Number of Applications per Year	Maximum Oz of Product /Acre/Year	Maximum Lb AI/A per Year	Preharvest Interval
Wheat (Including Durum) and Triticale	6.75 to 8.52 <sup>1</sup>	0.013 lb to 0.017 lb pyroxsulam	1	8.52	0.017 lb pyroxsulam	60 ays

<sup>1</sup>Use the higher rate for more difficult to control weeds such as downy brome.

**Chemigation: DO NOT** apply this product through any type of irrigation system.

**DO NOT** apply Simplicity directly to, or otherwise permit it to come into direct contact with, susceptible crops or desirable plants including alfalfa, barley, canola, beans, cotton, flowers, grapes, lettuce, lentils, mustard, oats, peas, potatoes, radishes, soybeans, sugar beets, sunflowers, tobacco, tomatoes, vegetables, or other desirable broadleaf crops or ornamental plants. **DO NOT** permit spray mists containing Simplicity to drift onto such plants

**DO NOT** apply to crops underseeded with legumes.

## Crop Rotation Intervals

The following rotational crops may be planted at the indicated interval following application of Simplicity.

**Crop Rotation Intervals for All States Except Arizona, California, Idaho, Oregon, and Washington**  
Superscripted numbers refer to Crop Specific Rotation Information.

Crop	Rotation Interval (Months) <sup>1</sup>
wheat, triticale	1
soybean <sup>2</sup>	5
barley, field corn, grasses, millet, oats, popcorn, seed corn, sweet corn, grain sorghum <sup>4</sup> , sunflower <sup>4</sup>	9
alfalfa, camelina, canola, chickpea, cotton <sup>3</sup> , dry bean, pea (dry and succulent), flax, lentil, mustard, peanuts, potato, safflower, sugar beet, sunflower	
other crops not listed	12

### Crop Specific Rotation Information:

<sup>1</sup>Minimum number of months that must elapse before planting other crops after application of Simplicity

<sup>2</sup>As a rotation crop, soybeans may be planted 3 months following an application of Simplicity in February or later in the following states: Alabama, Arkansas, Delaware, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Missouri, Mississippi, North Carolina, Nebraska, New Jersey, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas and Virginia. However, to ensure adequate crop safety, avoid planting soybeans prior to April 30 following an application of Simplicity made before February. All other states not listed require a minimum rotation interval of 5 months after an application of Simplicity.

<sup>3</sup>As a rotation crop, cotton may be planted 3 months following an application of Simplicity in February or later in the following states: Alabama, Arkansas, Georgia, Kansas, Kentucky, Louisiana, Missouri,

Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, and Virginia. However, to ensure adequate crop safety, avoid planting cotton prior to April 30 following an application of Simplicity made before February. All other states not listed require a minimum rotation interval of 9 months after an application of Simplicity.

<sup>4</sup>As a rotation crop, grain sorghum and sunflowers may be planted 3 months following an application of Simplicity in February or later in the following states: Alabama, Arkansas, Colorado, Delaware, Georgia, Illinois, Indiana, Kansas, Kentucky, Louisiana, Maryland, Missouri, Mississippi, North Carolina, Nebraska, New Jersey, Ohio, Oklahoma, Pennsylvania, South Carolina, Tennessee, Texas, and Virginia. However, to ensure adequate crop safety, avoid planting sunflowers and grain sorghum prior to April 30 following an application of Simplicity made before February. All other states not listed require a minimum rotation interval of 9 months after an application of Simplicity.

### Crop Rotation Intervals for Arizona and California

Superscripted numbers refer to Crop Specific Rotation Information.

Crop	Rotation Interval (Months) <sup>1</sup>
triticale, wheat	1
corn (field, silage), cotton, dry beans, melons, sorghum (grain, silage), sudangrass	3
alfalfa, broccoli, cabbage, cauliflower, lettuce, onion	5
barley, grasses, millet, oats, popcorn, seed corn, sweet corn, camelina, canola, chickpea, flax, lentil, mustard, pea (dry and succulent), potato, safflower, soybean, sugar beet, sunflower, tomato	9
other crops not listed	12

<sup>1</sup>Minimum number of months that must elapse before planting other crops after application of Simplicity.

### Crop Rotation Intervals for Idaho, Oregon, and Washington

Superscripted numbers refer to Crop Specific Rotation Information.

Crop	Rotation Interval (Months) <sup>1</sup>	
	Soil pH >6 and Rainfall <sup>2</sup> >16 Inches	Soil pH <6 or Rainfall <sup>2</sup> <16 Inches
wheat, triticale	1	1
barley, field corn, grasses, millet, oats, popcorn, seed corn, sweet corn, grain sorghum	10	10
alfalfa, camelina, canola, cotton, dry bean, flax, mustard, peanuts, safflower, soybean, sugar beet, sunflower		
pulse crops <sup>3</sup> including chickpea, lentil, and pea (dry and succulent), potato <sup>3</sup>		18
other crops not listed	12	

### Crop Specific Rotation Information:

<sup>1</sup>Minimum number of months that must elapse before planting other crops after application of Simplicity.

<sup>2</sup>Including irrigation.

<sup>3</sup>Pulse crops, including chickpea, lentil, and pea (dry and succulent), and potatoes may be planted 10 months after application if the soil pH is uniformly 6 or greater AND total rainfall (including irrigation)

during the interval is greater than 16 inches. If the soil pH is less than 6 OR total rainfall (including irrigation) is less than 16 inches, then the rotation interval is 18 months.

**Note:** Simplicity is degraded primarily by microbial activity and breaks down more rapidly under favorable soil moisture and temperature conditions. Correspondingly, the rate of degradation may be slower under extreme conditions of drought or cold temperatures. When soil moisture conditions are abnormally dry during the interval between an application of Simplicity and planting the next crop, conduct a field bio-assay by planting test strips of the desired rotational crop. Monitor the test strips during germination and emergence for any abnormal growth to determine if the rotational crop can be grown successfully.

## **MANDATORY SPRAY DRIFT MANAGEMENT**

### **Aerial Applications:**

- **DO NOT** release spray at a height greater than 10 ft above the ground or vegetative canopy, unless a greater application height is necessary for pilot safety.
- Applicators are required to use a medium or coarser droplet size (ASABE S572.3).
- If the windspeed is 10 miles per hour or less, applicators must use ½ swath displacement upwind at the downwind edge of the field. When the windspeed is between 11-15 miles per hour, applicators must use ¾ swath displacement upwind at the downwind edge of the field.
- **DO NOT** apply when wind speeds exceed 15 mph at the application site. If the windspeed is greater than 10 mph, the boom length must be 65% or less of the wingspan for fixed wing aircraft and 75% or less of the rotor diameter for helicopters. Otherwise, the boom length must be 75% or less of the wingspan for fixed-wing aircraft and 90% or less of the rotor diameter for helicopters.
- **DO NOT** apply during temperature inversions.”

### **Ground Boom Applications:**

- User must only apply with the release height recommended by the manufacturer, but no more than 3 feet above the ground or crop canopy.
- Applicators are required to use a medium or coarser droplet size (ASABE S572.3).
- **DO NOT** apply when wind speeds exceed 15 miles per hour at the application site.
- **DO NOT** apply during temperature inversions.

## **SPRAY DRIFT ADVISORIES**

THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT.  
BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL  
CONDITIONS.

### **IMPORTANCE OF DROPLET SIZE**

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

#### **Controlling Droplet Size – Ground Boom**

- Volume - Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed, consider using a nozzle with a higher flow rate.
- Pressure - Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.
- Spray Nozzle - Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

#### **Controlling Droplet Size – Aircraft**

- Adjust Nozzles - Follow nozzle manufacturers' recommendations for setting up nozzles. Generally, to reduce fine droplets, nozzles should be oriented parallel with the airflow in flight.

**BOOM HEIGHT – Ground Boom**

For ground equipment, the boom should remain level with the crop and have minimal bounce.

**RELEASE HEIGHT - Aircraft**

Higher release heights increase the potential for spray drift.

**SHIELDED SPRAYERS**

Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

**TEMPERATURE AND HUMIDITY**

When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

**TEMPERATURE INVERSIONS**

Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

**WIND**

Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS.

- Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

**Sensitive Areas:** Apply the pesticide only when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).

**California Application Requirements for Protection of Sensitive Crops**

In addition to precautions in the **MANDATORY SPRAY DRIFT MANAGEMENT** and **SPRAY DRIFT ADVISORIES** sections, the following drift management requirements must be followed to minimize the potential for exposure of sensitive crops in California.

**Buffer Zones**

The following buffer zones between the treated area and sensitive crops are required when these sensitive crops are downwind of the application site.

Sensitive Crop	Downwind buffer zone, feet	
	Ground	Air
carrot	120	500
onions	10	100
oat and ryegrass	50	250
All other broadleaf annual crops	20	160
tree and vine crops	20	160
dormant tree and vine crops	No buffer zone is required	

## Mixing Directions

### Simplicity - Alone

1. Fill the tank with 1/2 of the total amount of water.
2. Start agitation.
3. Add the required amount of Simplicity.
4. Add the required amount of adjuvant (refer to Adjuvants section).
5. Continue agitation while filling the spray tank to the required volume.
6. To ensure a uniform spray mixture, continuous agitation is required during application. If product is allowed to settle, thoroughly agitate to resuspend the mixture before spraying. Apply mixture immediately after it is prepared.

### Simplicity - Tank Mix

If a broader spectrum of weed control is needed, Simplicity may be tank mixed with labeled rates of other herbicides provided (1) the tank mix product is labeled for the timing and method of application for the use site to be treated; and (2) tank mixing is not prohibited by the label of the tank mix product.

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and direction for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

### Tank Mixing Precautions:

- Read carefully and follow all applicable use directions, precautions, and limitations on the respective product labels.
- **DO NOT** mix with products containing dicamba or amine formulations of 2,4-D or MCPA as these products may reduce grass control provided by Simplicity.
- **DO NOT** tank mix with organophosphate insecticides as these mixtures may result in unacceptable crop injury.
- **DO NOT** exceed specified application rates for respective products or maximum allowable application rates for any active ingredient in the tank mix.
- Always perform a (jar) test to ensure the compatibility of products to be used in tank mixture.
- Incompatible mixtures may lead to difficult to clean herbicide residues in the spray tank which if not properly cleaned could cause damage to sensitive crops.

**Tank Mix Compatibility Testing:** Perform a jar test prior to tank mixing to ensure compatibility of Simplicity and other pesticides. Use a clear glass quart jar with lid and mix the tank mix ingredients in their relative proportions. Invert the jar containing the mixture several times and observe the mixture for approximately 1/2 hour. If the mixture balls-up, forms flakes, sludges, gels, oily films or layers, or other precipitates, it is not compatible and the tank mix combination must not be used.

Vigorous, continuous agitation during mixing, filling and throughout application is required for all tank mixes. Sparger pipe agitators generally provide the most effective agitation in spray tanks. To prevent foaming in the spray tank, avoid stirring or splashing air into the spray mixture.

### Mixing Order for Tank Mixes:

1. Fill the spray tank to 3/4 of the total spray volume required with water.
2. Start agitation.
3. Add Simplicity and agitate for 2 to 3 minutes
4. After adding Simplicity, add different formulation types in the following order: (1) dry flowables; (2) wettable powders; (3) aqueous suspensions, flowables and liquids. Maintain agitation and add: (4) emulsifiable concentrates; (5) solutions; and (6) adjuvants. Allow time for complete mixing and dispersion after each addition.
5. Finish filling the spray tank. Maintain continuous agitation during mixing and throughout application. If product is allowed to settle, thoroughly agitate to resuspend the mixture before spraying. Apply mixture immediately after it is prepared.

If application or agitation must be stopped before the spray tank is empty, the materials may settle to the bottom. Settled materials must be resuspended before spraying is resumed. A sparger agitator is particularly useful for this purpose. Settled material may be more difficult to resuspend than when originally mixed.

### Clean-Out Procedures for Spray Equipment

1. Drain any remaining spray mixture from the application equipment, then wash out tank, boom, and hoses with clean water. Drain again.
2. Hose down the interior surfaces of the tank while filling the tank 1/2 full of water.
3. Add commercial tank cleaner, such as household ammonia, at a rate of 1 gallon per 100 gallons of water. Recirculate for 10 – 20 minutes and spray out the mixture through the boom.
4. Remove all spray nozzles and screens and clean separately.
5. If spray equipment will be used for pesticide application to crops sensitive to Simplicity, repeat steps 1 through 3. Additional steps may be required to remove all traces of Simplicity including replacing hoses or other fittings that may contain adsorbed actives.
6. Thoroughly clean exterior surfaces of spray equipment.

Note: Rinsate may be disposed of on site according to label use directions or at an approved waste disposal facility. Reduced results may occur if water containing soil is used, such as visibly muddy water or water from ponds and ditches that is not clear.

### Weeds Controlled (C) or Suppressed (S)

Best results are obtained when grass weeds are treated at the 2-leaf to 2-tiller stage of growth and before broadleaf weeds are larger than 2 inches tall or 2 inches in diameter. Best control is achieved when applications are made to actively growing weeds. Control may be reduced when weeds are exposed to drought or extreme temperatures. Simplicity will not control known ALS (Group 2) resistant biotypes of labeled weeds.

Common name	Scientific Name	Control/Suppression
<b>Grass Weeds</b>		
barley, foxtail	<i>Hordeum jubatum</i>	S
blackgrass	<i>Alopecurus myosuroides</i>	C
brome, downy	<i>Bromus tectorum</i>	S
brome, Japanese	<i>Bromus japonicus</i>	C
brome, ripgut	<i>Bromus diandrus</i>	C
canarygrass, hood	<i>Phalaris paradoxa</i>	S
canarygrass, littleseed	<i>Phalaris minor</i>	S
cheat	<i>Bromus secalinus</i>	C
chess, hairy	<i>Bromus commutatus</i>	C
fescue, rattail	<i>Vulpia myuros</i>	S
foxtail, green	<i>Setaria viridis</i>	S
foxtail, yellow	<i>Setaria pumila</i>	C <sup>4</sup>
oat, wild	<i>Avena fatua</i>	C
quackgrass	<i>Elymus repens</i>	S
rescuegrass	<i>Bromus catharticus</i>	S
ryegrass, Italian	<i>Lolium perenne</i>	C
windgrass	<i>Apera spica-venti</i>	C
<b>Broadleaf Weeds</b>		
bedstraw, catchweed (cleavers)	<i>Galium aparine</i>	C
buckwheat, wild	<i>Polygonum convolvulus</i>	S
canola, volunteer <sup>2</sup>	<i>Brassica rapa, Brassica napus</i>	C
chickweed, common	<i>Stellaria media</i>	C

chickweed, mouseear	<i>Cerastium fontanum</i>	C
dogfennel	<i>Eupatorium capillifolium</i>	C
falseflax, smallseed <sup>1</sup>	<i>Camelina microcarpa</i>	C
fiddleneck, coast	<i>Amsinckia menziesii</i> var. intermedia	C
flixweed <sup>2</sup>	<i>Descurainia sophia</i>	C
goosefoot, nettleleaf	<i>Chenopodium murale</i>	C
gromwell, corn	<i>Buglossoides arvensis</i>	C
hempnettle, common	<i>Galeopsis tetrahit</i>	C
henbit	<i>Lamium amplexicaule</i>	S
ladysthumb	<i>Polygonum persicaria</i>	C
lambsquarters, common	<i>Chenopodium album</i>	C <sup>3</sup>
mustard, black	<i>Brassica nigra</i>	C
mustard, blue <sup>1</sup>	<i>Chorispora tenella</i>	C
mustard, tumble <sup>1</sup>	<i>Sisymbrium altissimum</i>	C
mustard, wild	<i>Sinapis arvensis</i>	C
mustard, wormseed <sup>1</sup>	<i>Erysimum cheiranthoides</i>	C
nettle, burning	<i>Urtica urens</i>	C
radish, wild	<i>Raphanus raphanistrum</i>	C
pennycress, field <sup>1</sup>	<i>Thlaspi arvense</i>	C
pigweed, redroot	<i>Amaranthus retroflexus</i>	C
shepherd's-purse <sup>1</sup>	<i>Capsella bursa-pastoris</i>	C
tansymustard, pinnate <sup>1</sup>	<i>Descurainia pinnata</i>	C
thistle, Russian	<i>Salsola tragus</i>	C <sup>3</sup>
wallflower, bushy <sup>1</sup>	<i>Erysimum repandum</i>	C

<sup>1</sup>Control may be reduced when application is made after bolting

<sup>2</sup>Including herbicide-tolerant canola varieties except Clearfield (imidazolinone-tolerant) canola.

<sup>3</sup>Less than 2 inches tall. For control of lambsquarters over 2 inches tall, tank mix with 0.25 lb ae MCPA or 2,4-D. For control of Russian thistle over 2 inches tall, tank mix with 0.25 lb ae 2,4-D.

<sup>4</sup>One to four-leaf stage of growth

## Weed Resistance Management

Simplicity, which contains the active ingredient pyroxsulam is a group 2 herbicide based on the mode of action classification system of the Weed Science Society of America.

Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is a best practice. A diversified weed management program may include the use of multiple herbicides with different modes of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate and directions for use is important to delay the selection for resistance.

The continued effectiveness of this product depends on the successful implementation of a weed resistance management program.

To aid in the prevention of developing weeds resistant to this product, users should:

- Scout fields before application to ensure herbicides and rates will be appropriate for the weed species and weed sizes present.
- Start with a clean field, using either a burndown herbicide application or tillage.
- If using post-emergence herbicides or tank mixes, control weeds early when they are relatively small.
- Apply full rates of Simplicity for the most difficult to control weed in the field at the specified time to minimize weed escapes.
- Scout fields after application to detect weed escapes or shifts in control of weed species.



- Control weed escapes before they reproduce by seed or proliferate vegetatively.
- Report any incidence of non-performance of this product against a particular weed to your local company representative, local retailer, or county extension agent.
- Contact your local company representative, crop advisor, or extension agent to find out if suspected resistant weeds to this MOA have been found in your region. If resistant biotypes of target weeds have been reported, use the application rates of this product specified for your local conditions. Tank mix products so that there are multiple effective modes of action for each target weed.
- If resistance is suspected, treat weed escapes with an herbicide having a mode of action other than Group 2 and/or use nonchemical methods to remove escapes, as practical, with the goal of preventing further seed production.
- Suspected herbicide-resistant weeds may be identified by these indicators:
  - Failure to control a weed species normally controlled by the herbicide at the dose applied, especially if control is achieved on adjacent weeds;
  - A spreading patch of non-controlled plants of a particular weed species; and
  - Surviving plants mixed with controlled individuals of the same species.

Additionally, users should follow as many of the following herbicide resistance management practices as is practical:

- Use a broad spectrum herbicide with other mode of action as a foundation in a weed control program, if appropriate.
- Utilize sequential applications of herbicides with alternative modes of action.
- Rotate the use of this product with non-Group 2 herbicides.
- Avoid making more than two sequential applications of Simplicity and any other Group 2 herbicides within a single growing season unless mixed with an herbicide with a different mode of action with an overlapping spectrum for the difficult-to-control weeds.
- Incorporate non-chemical weed control practices, such as mechanical cultivation, crop rotation, cover crops and weed-free crop seeds, as part of an integrated weed control program.
- Use good agronomic principles that enhance crop development and crop competitiveness.
- Thoroughly clean plant residues from equipment before leaving fields suspected to contain resistant weeds.
- Manage weeds in and around fields to reduce weed seed production.

## **Application Directions**

### **Application Timing**

Apply Simplicity postemergence to the main flush of actively growing weeds according to the target weed stage shown in the above table. Extreme growing conditions including drought, temperatures near or below freezing prior to, at, or following time of application may reduce weed control and increase the risk of crop injury at all stages of growth.

Warm, moist growing conditions promote active weed growth and enhance the activity of Simplicity by allowing maximum foliar uptake and contact activity. Weeds hardened off by cold weather or drought stress may not be adequately controlled or suppressed and re-growth may occur. For best results, ensure thorough spray coverage of target weeds.

If foliage is wet at the time of application, control may be decreased. Applications of Simplicity are rainfast within 4 hours after application.

### **Spray Coverage**

Use sufficient spray volume to provide thorough coverage and a uniform spray pattern. **DO NOT** broadcast apply in less than 5 gallons of total spray volume per acre. For best results and to minimize spray drift, apply in a spray volume of 10 gallons or more per acre. As vegetative canopy and weed density, increase spray volume to obtain equivalent weed control. Use only nozzle types and spray equipment designed for herbicide application. To reduce spray drift, follow precautions under Avoiding Injurious Spray Drift.

### **Adjuvants**

When Simplicity is applied alone, use one of the following surfactants or adjuvants:

- Non-ionic surfactant with at least 80% active ingredient at 0.25% to 0.50% v/v (1 to 2 quarts per 100 gallons spray solution). In conditions of moisture stress or low relative humidity, add spray grade ammonium sulfate at 1.5 lb per acre.
- Crop oil concentrate adjuvant at 0.8% v/v (0.8 gallons per 100 gallons of spray solution)
- Methylated seed oil adjuvant at 0.8% v/v (0.8 gallons per 100 gallons of spray solution).

When Simplicity is applied in spray solutions containing liquid fertilizer, use a non-ionic surfactant with at least 80% active ingredient at a maximum of 0.25% v/v (1 quart per 100 gallons of spray solution).

**When Simplicity is applied in combination with emulsifiable concentrate (EC) formulations, including 2,4-D ester, MCPA ester, Starane or bromoxynil+MCPA products, DO NOT use an adjuvant.**

**DO NOT** use additives that lower the spray solution below a pH of 6.0.

When an adjuvant is to be used with this product, Corteva advises the use of a Chemical Producers and Distributors Association certified adjuvant.

### **Application in Fluid Fertilizer**

Simplicity may be applied in spray solutions containing liquid nitrogen. The spray solution should not be composed of more than 50% liquid nitrogen and should not exceed 30 lb of actual nitrogen per acre. When Simplicity is applied in spray solutions containing liquid nitrogen, use a non-ionic surfactant at a maximum of 0.25% v/v instead of crop oil concentrate or methylated seed oil. Temporary crop injury may result when liquid nitrogen is used as the spray carrier. Foliar applied liquid nitrogen may cause foliar leaf burn, yellowing or reduced growth due to the activity of the liquid fertilizer on the crop.

### **Wheat (Including Durum) and Triticale**

Apply 6.75 to 8.52 fl oz of Simplicity per acre (0.013 to 0.017 lb ai/A) in either fall or spring to actively growing wheat (including spring, winter and durum) and triticale from the 3-leaf to jointing stage (Zadoks scale 31) for control or suppression of target weeds (refer to section above entitled Weeds Controlled (C) or Suppressed (S)). Treat after the majority of weeds have emerged. Use the higher rate for more difficult to control weeds such as downy brome. Best results are obtained when application is made to weeds that are actively growing.

Occasionally, slight yellowing or height reduction may be observed in the treated crop. These transient symptoms disappear within 14 days with no reduction to yield. **DO NOT** apply to crops suffering from drought, water-logged soils, nutrient deficiency or exposed to frost or other agronomic factors affecting plant growth. **DO NOT** use on wheat or triticale varieties that are sensitive to ALS herbicides.

**Tank Mixtures:** Simplicity may be applied in tank mix combination with labeled rates of other products registered for postemergence application in wheat or triticale. See Tank Mixing Precautions under Mixing Directions. When tank mixing, **DO NOT** exceed specified application rates and use only in accordance with the most restrictive precautions and limitations on the respective product labels.

**Crop Specific Use Restrictions:**

- **Preharvest Interval: DO NOT** apply within 60 days of harvest.
- **DO NOT** apply more than a total of 8.52 fl oz of Simplicity per acre per year.
- **DO NOT** graze the treated crop within 7 days following application.
- **DO NOT** cut the treated crop for hay within 28 days following application.
- **DO NOT** apply a product containing organophosphates for five days before or five days after an application of Simplicity.

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**Terms and Conditions of Use**

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**Warranty Disclaimer**

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**Inherent Risks of Use**

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1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of product used.

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