



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 1, 2017

David Barnekow, Ph.D.
Regulatory Manager
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Subject: Label Amendment – renewing supplemental labeling: “For Use on Grass Harvested for Hay Intended for Distribution or Sale Off the Farm or Ranch for Use on Grass Harvested for Silage, Haylage, Baylage, or Green Chop Intended for Use on the Farm or Ranch”
Product Name: Forefront HL
EPA Registration Number: 62719-630
Application Date: March 15, 2017
Decision Number: 528141

Dear Dr. Barnekow:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

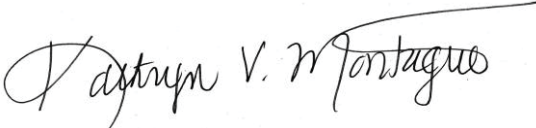
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or 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 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.

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Your release for shipment of the product 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. If you have any questions, please contact Beth Benbow by phone at 703-347-8072, or via email at Benbow.bethany@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Kathryn V. Montague". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

ACCEPTED

05/01/2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 62719-630

Supplemental Labeling



Dow AgroSciences

Dow AgroSciences LLC

9330 Zionsville Road

Indianapolis, IN 46268-1054 USA

ForeFront® HL

EPA Reg. No. 62719-630

For Distribution and Use Only in AL, AR, AZ, CO, FL, GA, ID, KS, KY, LA, MO, MS, MT, ND, NE, NM, NV, OK, SD, TN, TX, UT, WY

For Use on Grass Harvested for Hay Intended for Distribution or Sale Off the Farm or Ranch

For Use on Grass Harvested for Silage, Haylage, Baylage, or Green Chop Intended for Use On the Farm or Ranch

This supplemental label expires on April 7, 2020 and must not be used or distributed after this date.

ATTENTION

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Read the label affixed to the container for ForeFront® HL herbicide before applying. Carefully follow all precautionary statements and applicable use directions.
- Use of ForeFront HL according to this supplemental labeling is subject to all use precautions and limitations imposed by the label affixed to the container for ForeFront HL.

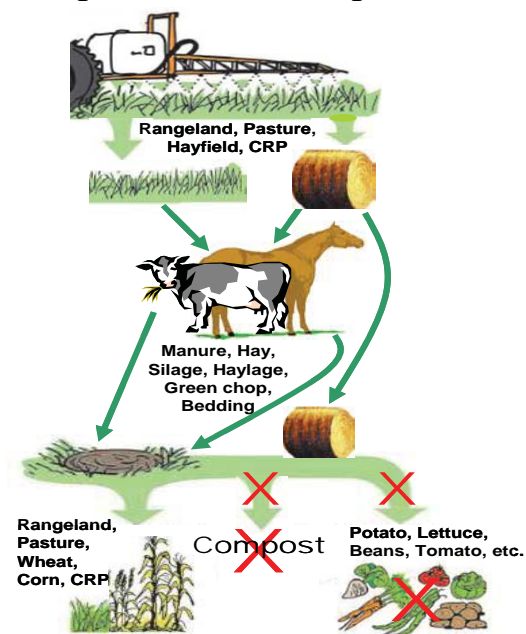
Use Precautions and Restrictions

Consult with a Dow AgroSciences representative if you do not understand the "Use Precautions and Restrictions." Call (1-800-263-1196) for more information.

IMPORTANT USE PRECAUTIONS AND RESTRICTIONS TO PREVENT INJURY TO DESIRABLE PLANTS

- It is mandatory to follow the "Use Precautions and Restrictions" section of this product label.
- Manure and urine from animals consuming treated grass or forage may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- The Applicator must provide the land manager with a copy of the Dow AgroSciences Stewardship instructions regarding uses of forage from areas treated with aminopyralid.

Forage and Manure Management



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- **Do not use grasses treated with ForeFront HL in the preceding 18-months for hay intended for export outside the United States.**
- **Do not use hay or straw from areas treated with ForeFront HL within the preceding 18-months, or manure from animals feeding on hay treated with ForeFront HL, in compost.**
- **Do not use grasses treated within the preceding 18-months for seed production.**
- **Grazing and Haying Restrictions:** Do not harvest forage for hay within 7 days of ForeFront HL application. Cutting hay too soon after spraying weeds can compromise the weed control. Wait 14 days prior to cutting grass hay to allow for maximum herbicide activity.
- **Transfer of Animals Feeding on ForeFront HL-Treated Forage:** Do not transfer animals grazing or feeding on hay from areas treated with ForeFront HL to areas where sensitive broadleaf crop occur without first allowing 3 days of grazing on an untreated pasture. Otherwise, urine and manure may contain enough aminopyralid to cause injury to sensitive broadleaf plants.
- **Grazing Poisonous Plants:** Herbicide application may increase palatability of certain poisonous plants. Do not graze treated areas until poisonous plants are dry and no longer palatable to livestock.
- **Restrictions in Hay or Manure Use:**
 - Do not use treated plant residues, including hay or straw from areas treated within the preceding 18-months, in compost, mulch or mushroom spawn.
 - Do not use manure from animals that have grazed forage or eaten hay harvested from treated areas within the previous 3 days, in compost, mulch or mushroom spawn.
 - Do not spread manure from animals that have grazed or consumed forage or hay from treated areas within the previous 3 days on land used for growing broadleaf crops.
 - Manure from animals that have grazed forage or eaten hay harvested from aminopyralid-treated areas within the previous 3 days may only be used on pasture grasses, grass grown for seed, wheat and corn.
 - Do not plant a broadleaf crop in fields treated in the previous year with manure from animals that have grazed forage or eaten hay harvested from aminopyralid-treated areas until an adequately sensitive field bioassay is conducted to determine that the aminopyralid residues in the soil is at level that is not injurious to the crop to be planted.
 - To promote herbicide decomposition, plant residues should be evenly incorporated in the surface soil or burned. Breakdown of aminopyralid in plant residues or manure is more rapid under warm, moist soil conditions and may be accelerated by supplemental irrigation.
- **Preharvest Interval:** Do not cut forage for hay within 7 days of application. For program lands, such as CRP, consult program rules to determine whether grass or hay may be used. The more restrictive requirements of the program rules or this label must be followed.
- **Chemigation:** Do not apply this product through any type of irrigation system.
- **Crop Rotation:** Do not rotate non-cropland to cropland for one year following an application of ForeFront HL. Do not plant a broadleaf crop until an adequately sensitive field bioassay shows that the level of aminopyralid present in the soil will not adversely affect that broadleaf crop.
- **Field Bioassay Instructions:** In fields previously treated with this product, plant short test rows of the intended rotational crop across the original direction of application in a manner to sample variability in field conditions such as soil texture, soil organic matter, soil pH, rainfall pattern or drainage. The field bioassay can be initiated one year after the last application of aminopyralid in that field. Observe the test crop for symptoms of herbicidal activity, such as poor stand (effect on seed germination),

chlorosis (yellowing), and necrosis (dead leaves or shoots), or stunting (reduced growth). If herbicidal symptoms do not occur, the test crop can be grown. If there is apparent herbicidal activity, do not plant the field to the intended rotational crop; plant only to wheat, forage grasses, native grasses or grasses grown for hay.

- **ForeFront HL is highly active against many broadleaf plant species.** Do not use this product on areas where loss of desirable broadleaf forage plants, including legumes, cannot be tolerated.
- Trees adjacent to or in a treated area can occasionally be affected by root uptake of ForeFront HL through movement into the soil. Do not apply ForeFront HL within the root zone of desirable trees unless such injury can be tolerated. Use special caution near roses, and leguminous trees such as locusts, redbud, mimosa, and caragana.

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R393-008

EPA Accepted: __/__/__

Replaces: R393-006