



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 11, 2025

Adam Overton  
Regulatory Affairs Manager  
Environmental Science U.S., LLC  
5000 Centregreen Way  
Cary, NC 27513

Subject: Label Amendment - Registration Review Mitigation for Ethephon  
Product Name: Proxy  
EPA Registration Number: 101563-40  
Case Number: N/A  
Application Dates: April 6, 2018

Dear Adam Overton:

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

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. 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 12 months from the date of this letter. After 12 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.

If you have any questions about this letter, please contact Samantha Thomas by phone at 202-566-2368, or via email at [thomas.samantha@epa.gov](mailto:thomas.samantha@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Cathryn Britton".

Cathryn Britton  
Chief, Risk Management and Implementation  
Branch V  
Pesticide Re-evaluation Division (7508M)  
Office of Pesticide Programs

ENCLOSURE: Stamped label

# PROXY<sup>®</sup>

ABN: PROXY GROWTH REGULATOR

**ACCEPTED**

09/11/2025

Under the Federal Insecticide, Fungicide  
and Rodenticide Act as amended, for the  
pesticide registered under  
EPA Reg. No. 101563-40

• Editorial Note – Marketing claim positioned here

For Commercial Use on Golf Course Turf Only.  
Not For Residential Use.

Editorial Note – [Bracketed text] is optional

ACTIVE INGREDIENT: Ethephon [(2-chloroethyl)phosphonic acid]\* .....21.7%

OTHER INGREDIENTS: ..... 78.3%

TOTAL: ..... 100.0%

\*Contains 2 pounds ethephon per gallon.

EPA Reg. No. 101563-40

EPA Est. No.

**KEEP OUT OF REACH OF CHILDREN**

**DANGER /PELIGRO**

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.)

See [Leaflet][Booklet] for Complete Precautionary Statements and Directions for Use. (Note to reviewer: Location of additional precautionary statements, directions for use will vary between those listed, depending on container type/size.)

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 24 Hours a Day 1-800-424-9300

For PRODUCT USE Information Call 1-800-331-2867

## FIRST AID

If in eyes	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
If on skin or clothing	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15 - 20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
If inhaled	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or ambulance, and then give artificial respiration preferably mouth-to-mouth if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>

**NOTE TO PHYSICIAN:** Probable mucosal damage may contraindicate the use of gastric lavage. No specific antidote is available. All treatments should be based on observed signs and symptoms of distress in the patient. Overexposure to materials other than this product may have occurred.

Victims of severe overexposure, by inhalation, should be kept under medical observation for up to 72 hours for delayed onset of pulmonary edema. In a victim of overexposure by ingestion, careful gastric lavage is required due to the possibility of stomach or esophageal perforation. This material is an acid, but the use of alkaline substances to neutralize it is contraindicated.

# PRECAUTIONARY STATEMENTS

## DANGER/PELIGRO

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive: Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed or absorbed through skin. Do not get in eyes or on clothing. Avoid contact with skin. Do not inhale vapors, as this product will irritate mucous membranes.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear long-sleeved shirts and long pants, chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride, shoes plus socks, and protective eyewear.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product 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.

### USER SAFETY RECOMMENDATIONS

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

Users should remove clothing immediately if pesticide gets inside. Then wash body thoroughly and change into clean clothing. The contaminated clothing should be washed before reuse.

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

### ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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.

## DIRECTIONS FOR USE

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

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 regulations. Read entire label before using this product.

### PRODUCT USE

PROXY® is a plant growth regulator that may be used to suppress the formation of seedheads of various plants including *Poa annua* and white clover and also to suppress the growth of certain cool season grasses. PROXY is foliarly absorbed and is most effective on actively growing healthy turf. For best results, apply in sufficient volume of water to provide uniform coverage. Use of a spreader/sticker with an application of PROXY is not necessary. PROXY is rainfast within 2 hours. Do not allow entry into treated area until PROXY has dried. For maximum performance, delay mowing until the day after application.

### RESTRICTIONS

- Use is permitted on golf course turf on tees, greens, and fairways only. Do not use on residential turf or lawns, institutional turf, parks, recreational fields, or sod farms.
- Do not apply more than 3.4 lbs of ethephon a.i./A (5 oz product/1000 sq. ft.) per application.
- Do not apply more frequently than every 14 days.
- East of the Mississippi River: Do not apply more than 13.6 lbs of ethephon a.i./A (20 oz product/1000 sq. ft.) per year.
- West of the Mississippi River: Do not apply more than 20.4 lbs of ethephon a.i./A (30 oz product/1000 sq. ft.) per year.
- Do not use this product for purposes other than those listed on the label.
- Do not treat turfgrass with poor root systems or growing under stress due to poor soil conditions, drought, disease, or insect damage.
- Do not use PROXY in areas where excessive thatch has accumulated.
- Do not contaminate water used for irrigation or domestic purposes.
- Do not apply PROXY through any type of irrigation system.
- Mix only the amount of spray you expect to use each day. Do not allow mixed solution to stand overnight.
- Do not buffer spray solutions.
- DO NOT MIX PROXY WITH AMMONIUM THIOSULFATE. SUCH TANK MIXTURES MAY RESULT IN FORMATION OF TOXIC FUMES.

## PRECAUTIONS

- Avoid spray drift to nearby crops, as this product will cause modifications in plant growth. Plant injury may result.
- Scalping may occur on creeping bentgrass cultivars after more than 2 applications of PROXY for Poa seedhead suppression.
- PROXY has been used successfully on many bentgrass cultivars. Tolerance testing must be done on new cultivars before extensive use.
- Test tank mixes with other products on a small area before using widely.
- IMMEDIATELY RINSE ANY SPILLS WITH PLENTY OF WATER AS PROXY® IS CORROSIVE.

## EQUIPMENT CLEANING

Prolonged exposure to spray deposits will damage acrylic plastics, certain paints, and metals because of the acidic nature of this product.

Rinse thoroughly all exposed acrylic plastic materials and painted surfaces with a detergent and water within one hour after exposure to spray deposits.

### SPRAY DRIFT

#### Ground Boom Applications

- Apply with the nozzle height recommended by the manufacturer, but no more than 3 feet above the ground or plant canopy.
- For all applications, applicators are required to use a fine to medium or coarser droplet size (ASAE S572).
- Do not apply when wind speeds exceed 10 miles per hour at the application site.
- Do not apply during temperature inversions.

#### Boom-less Ground Applications

- • Setting nozzles at the lowest effective height will help to reduce the potential for spray drift

### 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.

#### **BOOM HEIGHT- Ground Boom**

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

### 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.

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## GOLF TURF

**Seedhead Suppression:** Foliar application of PROXY will provide suppression of *Poa annua* and white clover seedheads. Make the initial application prior to the emergence of new seedheads. A period of 2-3 weeks after application is required for maximum performance. Repeat applications may be made to predominately *Poa annua* or white clover sites as needed, but not less than two weeks after the previous application. Follow other precautions and restrictions on the label.

APPLICATION	SITES	RATE	SPRAY VOLUME
<b><u>Poa annua and White Clover Seedhead Suppression:</u></b> Reapplication interval: 2 weeks or greater for all labeled grasses	Golf course greens, tees, and fairways including on the following turfgrasses: Bentgrass, Kentucky Bluegrass, Perennial Ryegrass, Tall & Fine Fescue, and Bermudagrass.	5 fl oz/1,000 sq ft	1.0 - 2.0 gal/1,000 sq ft

**Tank Mixture with Primo MAXX:** Tank mixtures of PROXY at 5 oz per 1,000 sq ft and Primo MAXX at 0.125 or 0.25 ounce per 1,000 sq ft can be used to promote seedhead suppression as well as turfgrass quality. Multiple applications of the tank mix combination may be needed. The number of applications must not exceed recommendations for rates or timings for either product applied once. Follow the recommendation on each product label for the most restrictive application interval for each turfgrass. Application of this tank mixture during frost periods may cause temporary turf discoloration.

**Growth Suppression:** An application of PROXY slows the growth of turfgrasses, thus reducing the required frequency of mowing and the volume of clippings collected. For best turfgrass growth regulation, apply PROXY when daytime air temperatures are 65°F and rising. PROXY must only be applied once turfgrass mowing heights have been established for the season. Avoid multiple applications of PROXY in areas where excessive thatch has accumulated.

APPLICATION	SITES	RATE	SPRAY VOLUME
<b><u>Turfgrass Growth Regulation</u></b> Reapplication intervals: <ul style="list-style-type: none"><li>• Kentucky Bluegrass-7 weeks</li><li>• Perennial Ryegrass-7 weeks</li><li>• Tall/Fine Fescue-4 weeks</li><li>• Bentgrass-4 weeks</li></ul>	Golf course greens, tees, and fairways including on the following turfgrasses: Bentgrass, Kentucky Bluegrass, Perennial Ryegrass, and Tall & Fine Fescue.	5 fl oz/1,000 sq ft	1.0 - 2.0 gal/1,000 sq ft

## STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

### PESTICIDE STORAGE

Store in original container and keep tightly closed. Store in a cool dry place.

### PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER DISPOSAL

**Non-refillable container.** Do not reuse or refill this container. Offer for recycling, if available. Offer for reconditioning, if appropriate. Triple 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. Then offer for recycling or reconditioning or puncture and dispose of in a sanitary landfill or by incineration or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

## IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of ENVIRONMENTAL SCIENCE U.S., LLC. All such risks shall be assumed by the user or buyer.

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PROXY is a registered trademark of Environmental Science U.S., LLC

### Net Contents:

### PRODUCED FOR



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Cary, NC 27513





[Optional Marketing Claims:]

Pictures:

