



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 7, 2018

Annette Bloomberg
Regulatory Product Manager
Bayer CropScience
PO Box 12014, 2 TW Alexander Drive
Research Triangle Park, NC 27709

Subject: Amendment to Add a Supplemental Label – Supplemental label using Individual Plant Treatment methods on Vegetation Management Sites
Product Name: Viewpoint Herbicide
EPA Registration Number: 432-1580
Application Date: 01/25/2018
Decision Number: 538057

Dear Ms. Bloomberg:

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 is only for a supplemental label that is an addendum to the master label. 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.

This supplemental labeling contains some new and/or revised uses and/or directions which may be additional to the uses and/or directions found on the label on or attached to the container, but this supplemental labeling does not by itself constitute the complete set of use directions. The complete set of use directions is set forth on the container label as combined with this supplemental labeling.

A stamped copy of your labeling is enclosed for your records. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling.

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 Lisa Pahel by phone at (703) 347-0459, or via email at pahel.lisa@epa.gov.

Sincerely,

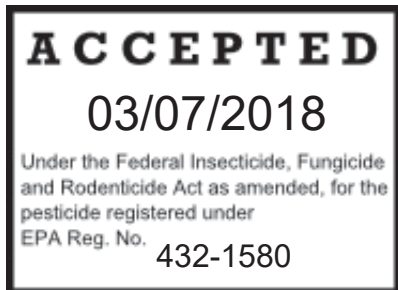
A handwritten signature in black ink, appearing to read "Erik Kraft". The signature is written in a cursive style with a large, stylized initial "E".

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

Enclosure



Bayer CropScience LP
P.O. Box 12014 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709
1-800-331-2867



VIEWPOINT® HERBICIDE

EPA Reg. No 432-1580

For Individual Plant Treatments on Vegetation Management Sites Transecting Grazed Areas

This supplemental label expires on 03/15/2021 and must not be used or distributed after this date.

Supplemental Label

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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 regulation. Read this label and the product package label before using this product. This Supplemental Label must be in the possession of the user at the time of pesticide application. Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the product label for VIEWPOINT HERBICIDE attached to the container. The use of Viewpoint Herbicide according to this labeling is subject to the use precautions and limitations imposed by the label affixed to the container of Viewpoint Herbicide.

USE DIRECTIONS FOR INDIVIDUAL PLANT TREATMENT (IPT) ON VEGETATION MANAGEMENT SITES TRANSECTING GRAZED AREAS

VIEWPOINT® HERBICIDE may be used to treat undesirable woody plants using INDIVIDUAL PLANT TREATMENT (IPT) methods in vegetation management sites transecting areas grazed by livestock. VIEWPOINT® HERBICIDE may be applied by ground equipment for control of undesirable woody plants (brush), including many terrestrial and riparian invasive and noxious weeds and is registered for use on private, public, and military lands.

Refer to the VIEWPOINT® HERBICIDE label for allowable use sites.

INDIVIDUAL PLANT TREATMENT (IPT)

Apply VIEWPOINT® HERBICIDE utilizing an application method (including low-volume or high-volume foliar sprays) which targets individual woody plant species. The total spray volume should be adjusted according to the size and density of the target plant species. Where taller/denser vegetation is present, higher spray volumes may be necessary to ensure good coverage. Refer to the BRUSH CONTROLLED section of the label for specific use rate information. For best results include a MSO-type adjuvant at the rate of 1% v/v. Refer to Table 1 for mixing instructions. Spray the vegetation starting at the top and covering the sides. Ensure complete coverage of the plant for best results. Avoid spraying to the point of runoff as injury to desirable species or ground cover may occur. Refer to the Low-Volume and High-Volume Foliar Application sections below for application use directions and rates.

DO NOT broadcast apply this product using aerial or ground equipment on vegetation management sites that transect grazed areas. There are no grazing restrictions where this product is used to treat undesirable woody plants (brush) by individual plant treatment (IPT) methods.

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IMPORTANT RESTRICTIONS

- DO NOT broadcast apply this product using aerial or ground equipment on vegetation management sites that transect grazed areas.
- DO NOT apply this product in areas where the roots of desirable trees and/or shrubs may extend unless injury or loss can be tolerated. The root zone of desirable trees or vegetation is affected by species, soil properties including depth of soil, and local conditions and can extend well beyond the tree canopy.
- DO NOT apply this product if site-specific characteristics and conditions exist that could contribute to movement and unintended root zone exposure to desirable trees or vegetation unless injury or loss can be tolerated.
- DO NOT make applications when circumstances favor movement from treatment site.
- Do not apply VIEWPOINT® HERBICIDE to roadsides or other non-crop areas during periods of intense rainfall, or where prevailing soils are either saturated with water or of a type through which rainfall will not readily penetrate, as this may result in off-site movement.
- DO NOT apply or otherwise permit this product or sprays containing this product to come into contact with any non-target crop or desirable vegetation.
- DO NOT apply in or on dry or water containing irrigation ditches or canals, including their outer banks.
- DO NOT apply through any type of irrigation system.
- DO NOT contaminate water intended for irrigation. To avoid injury to crops or other desirable vegetation, do not treat or allow spray drift or run-off to fall onto banks or bottoms of irrigation ditches, either dry or containing water, or other channels that carry water that may be used for irrigation purposes.
- Treatment of powdery, dry soil and light, sandy soils when there is little likelihood of rainfall soon after treatment may result in off target movement and possible damage to susceptible crops and desirable vegetation when soil particles are moved by wind or water. Injury to crops or sensitive vegetation may result if treated soil is washed, blown or moved onto land used to produce crops or land containing desirable vegetation. DO NOT apply VIEWPOINT® HERBICIDE when these conditions are identified and powdery, dry, or light sandy soils are known to be prevalent in the area to be treated.
- DO NOT apply when the soil is frozen or covered with snow.
- DO NOT use on lawns, walks, driveways, tennis courts, or similar areas.
- For sites listed in this label, do not apply more than a total of 20 ounces (contains 0.395 pounds imazapyr; 0.285 pounds aminocyclopyrachlor, and 0.091 pounds metsulfuron-methyl) of product per acre per year.
- Do not apply more than 20 oz per acre per single application.
- Do not apply more than two applications per year for all uses with a minimum of 30 days between applications.
- Do not apply more than 1.5 pounds of the active ingredient imazapyr per acre per year when using any combination of products containing imazapyr.
- Do not apply more than 0.28 pounds of the active ingredient aminocyclopyrachlor per acre per year when using any combination of products containing aminocyclopyrachlor.
- Do not apply more than 0.15 pounds of the active ingredient metsulfuron-methyl per acre per year when using any combination of products containing metsulfuron-methyl.
- DO NOT use plant material treated with this product for mulch or compost.
- If non-crop sites treated with VIEWPOINT® HERBICIDE are to be converted to a food, feed, or fiber agricultural crop, or to a horticultural crop, do not plant the treated sites for at least one year after the VIEWPOINT® HERBICIDE application. A field bioassay must then be completed before planting the desired crop.
- Not for sale, sale into, distribution, and/or use in Nassau and Suffolk counties of New York State.
- DO NOT use this product in California.
- DO NOT use this product in the following counties of Colorado: Saguache, Rio Grande, Alamosa, Costilla and Conejos.

IMPORTANT PRECAUTIONS

- Certain species may, in particular, be sensitive to low levels of VIEWPOINT® HERBICIDE including, but not limited to, conifers (including Douglas fir, Norway spruce, ponderosa pine, and white pine), deciduous trees (including aspen, Chinese tallow, cottonwood, honey locust, magnolia, poplar species, redbud, silver maple, and willow species), and ornamental shrubs (including arborvitae, burning bush, crape myrtle, forsythia, hydrangea, ice plant, magnolia, purple plum, and yew).
- Injury or loss of desirable trees or vegetation may result if VIEWPOINT® HERBICIDE is applied on or near desirable trees or vegetation, on areas where their roots extend, or in locations where the treated soil may be washed or moved into contact with their roots. Consider site-specific characteristics and conditions that could contribute to unintended root zone exposure to desirable trees or vegetation. Root zone areas of desirable trees or vegetation are affected by local conditions and can extend beyond the tree canopy. If further information is needed regarding root zone area, consult appropriate state extension service, professional consultant, or other qualified authority.
- Injury to or loss of desirable trees or vegetation may result if equipment is drained or flushed on or near these trees or vegetation, or on areas where their roots may extend, or in locations where the chemical may be washed or moved into contact with their roots.
- In non-crop areas adjacent to desirable vegetation, avoid overlapping spray applications.

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- Applications made where runoff water flows onto agricultural land may injure or kill crops, such as but not limited to sugar beets, potatoes, tomatoes, tobacco, soybeans, field beans, alfalfa, grapes, peaches, almonds, and vegetables.
- Applications should be made only when there is little or no hazard from spray drift. Very small quantities of spray, which may not be visible, may seriously injure susceptible plants.
- Exposure to VIEWPOINT® HERBICIDE may injure or kill most crops and may injure or kill desirable vegetation. Injury may be more severe when the crops or desirable vegetation are irrigated.
- Caution is advised when using this product in areas where loss of desirable vegetation cannot be tolerated. Desirable vegetation may include conifer or deciduous trees and/or shrubs as well as other broadleaf plants, including, but not limited to, legumes and wild flowers, and grasses. Without prior experience, it is necessary that small areas containing these plants be tested for crop safety to VIEWPOINT® HERBICIDE and its soil residues before any large scale spraying occurs.
- Low rates of VIEWPOINT® HERBICIDE can kill or severely injure most crops. Following a VIEWPOINT® HERBICIDE application, the use of spray equipment to apply other pesticides to crops on which VIEWPOINT® HERBICIDE is not registered may result in their damage. The most effective way to reduce this crop damage potential is to use dedicated mixing and application equipment.
- Leave treated soil undisturbed to reduce the potential for VIEWPOINT® HERBICIDE movement by soil erosion due to wind or water.
- In the case of suspected off-site movement of VIEWPOINT® HERBICIDE to cropland, soil samples should be quantitatively analyzed for VIEWPOINT® HERBICIDE or any other herbicide which could be having an adverse effect on the crop, in addition to conducting the field bioassay.

GROUND APPLICATION INFORMATION

LOW-VOLUME FOLIAR APPLICATION

See Table 1 for use rate and mixing guidelines. Adjust the VIEWPOINT® HERBICIDE spray concentration according to the spray volume per acre and the size and plant density of the target brush species. For best results, include an MSO adjuvant at the rate of 1% v/v. Good plant coverage is necessary for best results. Use spray nozzles and pressure that will aid the proper deposition of the spray solution. Apply in sufficient spray volume to insure uniform spray distribution of spray particles over the area to be treated and to avoid spray drift. In general, low volume ground applications use 20 to 50 gallons of spray solution per acre while ultra low volume ground applications typically use 10 to 20 gallons per acre. Use the higher concentration rates for hard to control brush species.

For low volume foliar applications, mix 52 to 80 ounces of VIEWPOINT® HERBICIDE per 100 gallons of spray solution. Do not apply more than 25 gallons of the spray solution per acre at the 80 ounces per 100 gallon spray solution mix rate.

HIGH-VOLUME FOLIAR APPLICATION

See Table 1 for use rate and mixing guidelines. High volume applications may be applied at rates equivalent to 20 ounces product per acre per year. Where a rate range is indicated for the brush species, use the higher rate for high density brush sites. For best results, use MSO adjuvant at the rate of 1% V/V to the spray solution. High volume ground spray applications will typically use 100 to 400 gallons of spray solution per acre.

When making high-volume foliar applications, apply near the tops of the brush plants in a light drizzle pattern. The spray solution must reach the crown of the plants and trickle down into the canopy. Use sufficient spray volume to thoroughly and uniformly wet foliage and stems but don't over apply causing run-off.

Table 1. VIEWPOINT® HERBICIDE Spray Volume and Use Rate Mixing Instructions

Table 1. VIEWPOINT® HERBICIDE Mixing Guide for Total Spray Volumes.			
Total Spray Volume	VIEWPOINT® HERBICIDE rate ounces per acre		
	16	18	20*
Gallons per acre	VIEWPOINT® HERBICIDE ounces per 100 gallons of spray solution		
400	4	4.5	5
300	5.3	6	6.7
200	8	9	10
100	16	18	20
75	21.3	24	26.7
50	32	36	40
40	40	45	50
30	53.3	60	66.7
25	64	72	80
20	80	90	100
15	106.7	120	133.3
10	160	180	200

* Do not exceed the maximum use rate of 20 ounces per acre per year.

Brush Controlled

BRUSH		VIEWPOINT® HERBICIDE USE RATE OUNCES/ACRE
Ash	<i>Fraxinus</i> sp.	16 - 20
Aspen	<i>Populus</i> sp.	16 - 20
Baccharis, eastern	<i>Baccharis halimifolia</i>	16 - 20
Black locust	<i>Robinia pseudoacacia</i>	16 - 20
Black tupelo/gum	<i>Nyssa sylvatica</i>	16 - 20
Boxelder	<i>Acer negundo</i>	16 - 20
Camelthorn	<i>Acacia erioloba</i>	16 - 20
Cherry	<i>Prunus</i> sp.	16 - 20
Cottonwood	<i>Populus</i> sp.	16 - 20
Elderberry	<i>Sambucus</i> sp.	16 - 20
Elm	<i>Ulmus</i> sp.	16 - 20
Hackberry, common	<i>Celtis occidentalis</i>	16 - 20
Hawthorn	<i>Crataegus</i> sp.	16 - 20
Honeysuckle	<i>Lonicera</i> sp.	16 - 20
Hophornbeam	<i>Ostrya</i> sp.	16 - 20
Locust, honey	<i>Gleditsia triacanthos</i>	16 - 20
Mesquite	<i>Prosopis juliflora</i>	16 - 20
Mulberry	<i>Morus</i> sp.	16 - 20
Myrtle dahoon	<i>Ilex myrtifolia</i>	16 - 20
Persimmon, common	<i>Diospyros virginiana</i>	16 - 20
Ocean spray	<i>Holodiscus</i> sp.	16 - 20
Osage orange	<i>Maclura pomifera</i>	16 - 20
Red maple	<i>Acer rubrum</i>	16 - 20
Sassafras	<i>Sassafras albidum</i>	16 - 20
Silver maple	<i>Acer sacharinum</i>	16 - 20
Snowberry	<i>Symphoricarpos</i> sp.	16 - 20
Sugarberry	<i>Celtis laevigata</i>	16 - 20
Sumac	<i>Rhus</i> sp.	16 - 20
Sweetgum	<i>Liquidambar styraciflua</i>	16 - 20
Sycamore	<i>Acer pseudoplatanus</i>	16 - 20
Tallow, Chinese	<i>Sapium sebiferum</i>	16 - 20
Tree of heaven	<i>Ailanthus altissima</i>	16 - 20
Willow	<i>Salix</i> sp.	16 - 20
Yellow poplar	<i>Liriodendron tulipifera</i>	16 - 20
Vaccinium	<i>Vaccinium</i> sp.	16 - 20
Cedar, eastern red ²	<i>Juniperus virginiana</i>	20
Dogwood	<i>Cornus</i> sp.	20
Fir	<i>Abies</i> sp.	20

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Hickory	<i>Carya</i> sp.	20
Huisache	<i>Acacia farnesiana</i>	20
Oak	<i>Quercus</i> sp.	20
Pine, loblolly	<i>Pinus taeda</i>	20
Pine, Virginia ^{3,4}	<i>Pinus virginia</i>	20
Privet, Chinese	<i>Ligustrum sinense</i>	20
Rabbitbrush, rubber	<i>Ericameria nauseosa</i>	20
Spruce, black	<i>Picea mariana</i>	20
Spruce, white	<i>Picea glauca</i>	20
Yaupon ³	<i>Ilex vomitoria</i>	20
VINES and BRIARS		
Blackberry	<i>Rubus</i> sp.	16 - 20
Dewberry	<i>Rubus trivialis</i>	16 - 20
Kudzu ¹	<i>Pueraria montana</i>	16 - 20
Multiflora rose	<i>Rosa multiflora</i>	16 - 20
Salmonberry	<i>Rubus spectabilis</i>	16 - 20
Thimbleberry	<i>Rubus parviflorus</i>	16 - 20
Wild grape	<i>Vitis rotundifolia</i>	16 - 20
Wild roses	<i>Rosa</i> sp.	16 - 20

1 - For best control multiple year applications may be necessary.

2 - For best control use high volume foliar applications.

3 - Suppression: a visual reduction in weed competition (reduced population or vigor) as compared to an untreated area.

4 - See specific weed section.

Thorough spray coverage of the brush foliage is necessary for best control.

Where sites contain tall or dense brush canopies, use the higher rate range for best control.

Specific Weed Directions:

Virginia Pine: For complete control, tankmix "Krenite" at 1.5 gallons per acre or glyphosate at 5.4 pounds active ingredient per acre (1 gallon of a 5.4 pound per gallon material or 1.33 gallons of a 4 pound per gallon material)

For MEDICAL and TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577

For PRODUCT USE Information Call 1-866-99BAYER 1-800-331-2867

As with any crop-protection product, always read and follow label directions.

For additional information call toll-free 1-800-331-2867).