



12125 Woodcrest Executive Drive, Suite 100, St. Louis, MO 63141, Phone: (314) 576-1770, Fax: (314) 576-2786

Comments of the American Soybean Association
on the Application for Emergency Exemptions for
Metconazole, Flusilazole, and Flutriafol
EPA Docket # OPP-2005-0241, OPP-2005-0242, OPP-2005-0243

The American Soybean Association (ASA) submits these comments in response to the application for emergency exemptions for flutriafol, flusilazole, and metconazole. On behalf of the 26,000 producer-members of ASA, we remain concerned about an adequate and readily available supply of fungicides to control soybean rust. Soybean rust is a fungal disease which leads to premature defoliation and decreased yields.

The United States is the world's leading soybean producer and exporter. The farm value of soybean production last year was \$18 billion, second only to corn among U.S. crops. Soybeans are planted on one-third of total U.S. row crop acreage. When soybean rust is widespread throughout the United States, it will be imperative that growers have access to a large number of fungicides produced by the maximum number of manufacturers. Adding these three fungicides to the products already registered with Section 3 or Section 18 approvals is critical to meeting this goal.

We agree with the application submitted by the states of Minnesota and South Dakota that no single product will be available in sufficient quantity to treat the potential land area impacted by soybean rust. Although the spread of soybean rust was limited in 2005, with confirmations in five states, we must continue preparation for the spread of the disease throughout the major soybean growing areas.

For further information, please contact Beverly Paul at (202) 969-7040.

We appreciate the opportunity to comment in support of granting these exemptions.