

October 5, 2005

Re: EPA Docket for Public Comment Period OPP2005-0241, OPP2005-0242, OPP2005-0243 flutriafol

To Who It May Concern,

It has come to the attention of The Agricultural Retailers Association, ARA, that a section 18 emergency exemption for a new fungicide tool in the fight against Asian Soybean Rust has been requested by a number of States. The ARA fully supports these submissions and hopes that EPA grants the Section 18's for the following reasons, both technical and for support of American agriculture in general.

First Asian Rust is a new threat to American agriculture, not just the important soybean crop, as it also attacks dry beans and other crops. It is a new threat and little is really know about how the disease life cycle will respond to our environment and cultural practices. At a time like this retailers and growers need all the tools possible to deal with this new unknown threat. The fungicide arsenal may appear full especially after the very limited infestation year we just experienced, but this season was hardly an indicator of things to come. Most experts agree that American farmers were just lucky during the 2005 season and that we all need to be ready to fight Rush will all available technologies in 2006.

I personally testified before congress this year explaining the role that Agricultural Retailers play in the total pest management war. ARA has been an active supporter of the EPA section 18 process to allow technologies to be used by growers to protect their livelihoods, as well as America's food supply. I believe that EPA has the same goal in protecting our food supply and that the agency has acted very responsibility in the total registration process this past season. Now is the time to continue building our arsenal of products by registering flutriafol, with the full knowledge that testing both in the U.S. and worldwide has shown it has proven efficacy. Actually flutriafol has proven performance equal to or better than any rust fungicide registered or not in the U.S. and it also is positive in a resistance management plan. Flutriafol is both a preventative and a curative which may allow it to be used in better IPM programs than just a preventative or just a curative.

Flutriafol has been sold commercially in other soybean growing areas for some time but the rust problem has just arrived in the U.S. so the product had no practical commercial uses. ARA has also heard that flutriafol has fit into an cost price to growers that is very competitive with existing commercial products.

ARA believes that the section 18 registration of flutriafol should receive your full attention since it meets the goals of all those dedicated to American agricultural, that is to protect our crops and provide for a safe and abundant food supply.

Thank you for your attention to this matter, and if you have any questions please contact me.

Sincerely;

James D. Thrift
V.P, Regulatory Policy and Corporate Relations