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August 14, 2015

Attention: Docket ID No. ID: EPA-HQ-OPP-2013-0141-0007

Submitted via: regulations.gov

Director Susan Lewis
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Docket ID No. ID: EPA-HQ-OPP-2013-0141-0007: Public Participation for New Active Ingredient Benzovindiflupyr (Solatenol)

Dear Director Lewis,

The Agricultural Retailers Association (ARA) is a not-for-profit trade association that represents the nation's agricultural retailers and distributors. ARA members provide goods and services to farmers and ranchers which include: fertilizer, crop protection chemicals, seed, crop scouting, soil testing, custom application of pesticides and fertilizers, and development of comprehensive nutrient management plans. Retail and distribution facilities are scattered throughout all 50 states and range in size from small family-held businesses or farmer cooperatives to large companies with multiple outlets. ARA supports the registration of Solatenol™, a new fungicide active ingredient being developed for use in many of the country's key crops.

Solatenol™ provides a new active ingredient to help our members' farmer customers manage several rust fungi as well other diseases such as septoria and powdery mildew. Solatenol™ provides another tool for our customers to control diseases should other compounds be less effective in regions exhibiting signs of resistance.

Producers will see the following benefits Solatenol™ can provide when registered by the EPA:

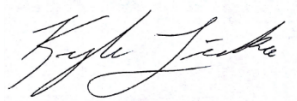
- New mode of action (succinate dehydrogenase inhibitor – SDHI) chemistry;
- In combination with azoxystrobin and propiconazole, Solatenol™ provides three different modes of action;
- Has excellent activity against rusts, Septoria, and powdery mildew;
- Provides long lasting control.

When sold in combination with other active fungicide ingredients Solatenol™:

- Will provide growers broad spectrum activity against many key fungal pathogens (actives: Solatenol, azoxystrobin, & propiconazole);
- Combines both preventive and curative activity;
- Combines three distinct modes of action making it more difficult for pathogens to develop resistance.

ARA members are concerned with the disease control challenges facing agricultural production across many regions of the U.S. and are constantly looking for the development of new tools to offer their growers to help manage these challenges. Syngenta's Solatenol™ is viewed as a potential product that will offer growers a solution to many disease control issues they face. We are asking for the EPA to register Solatenol™ in time for use on many important crops in 2016 in the United States.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Liske", is positioned above the typed name.

Kyle Liske
Public Policy Counsel
Agricultural Retailers Association