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The Honorable Philip Crane
Chairman
Committee on Ways and Means
Subcommittee on Trade
U.S. House of Representatives
Washington, DC 20515

June 5, 2002

Dear Chairman Crane:

Syngenta Corporation is pleased to provide the following comments regarding tariff relief bills for products which our company imports.

We have previously provided to the ITC this information, plus considerably more detail, including chemical names, CAS and HTS numbers, and estimated revenue impact.

Please let me know if you need additional information or more detail.

Thank you for your consideration.

Sincerely,

Edgar L. Ready, III, Ph.D.
Syngenta Corporation
Public Affairs

Comments for Duty Suspension/Reduction bills for products imported by Syngenta Corporation.

H.R. 4248: To suspend temporarily the duty on Paclobutrazole Technical

Product: Paclobutrazole Technical

Description: Paclobutrazole technical is imported into Syngenta's Omaha, NE facility for formulation into Bonzi plant growth regulator.

Use: Bonzi plant growth regulator is used in the production of greenhouse and bedding plants. Its use results in more compact, fuller, higher quality ornamental plants.

Source of Manufacture: Paclobutrazole is manufactured in the United Kingdom.

There is no domestic production of paclobutrazole.

H.R. 4249: To suspend temporarily the duty on Paclobutrazole 2SC

Product: Paclobutrazole 2SC

Description: Paclobutrazole 2SC is a formulation of paclobutrazole plant growth regulator. It is marketed as Trimmit®.

Use: Trimmit growth regulator is used on turf for growth reduction of annual bluegrass, a problem weed in high quality turfgrass areas.

Source of Manufacture: Paclobutrazole 2SC is manufactured in the United Kingdom.

There is no domestic manufacture of Paclobutrazole 2SC.

H.R. 4250: To suspend temporarily the duty on methidathion technical

Product: Methidathion Technical

Description: Methidathion is the active ingredient used in the manufacture of Supracide insecticide. It is imported into Gowan Milling Company of Yuma, AZ where it is formulated into Supracide.

Use: Supracide insecticide is used for control of a variety of insect pests in fruit and nut crops. It fits well into Integrated Pest Management programs.

Source of Manufacture: Methidathion is manufactured in Switzerland.

There is no domestic source of methidathion.

H.R. 4251: To suspend temporarily the duty on Vanguard 75 WDG

Product: Vanguard 75 WDG

Description: Vanguard 75 WDG is a fungicide containing the active ingredient cyprodonil.

Use: Vanguard 75 WDG is used to control foliar diseases on apples, grapes, almonds, and stone fruit.

Source of Manufacture: Vanguard 75 WDG is manufactured in Switzerland.

There is no domestic source of Vanguard 75 WDG.

H.R. 4252: To suspend temporarily the duty on Wakil XL

Product: Wakil XL

Description: Wakil XL is a formulated mixture of three active ingredients, Metalaxyl, Fludioxonil, and cymoxanil.

Use: Wakil XL is a fungicide seed treatment which is used to protect planted crop seeds from diseases such as damping off and seed rot on peas.

Source of Manufacture: Wakil XL is formulated in France.

There is no domestic source of Wakil XL.

H.R. 4253: To suspend temporarily the duty on Oxasulfuron technical

Product: Oxasulfuron

Description: Oxasulfuron is the active ingredient in Chart Herbicide. Chart herbicide is formulated and packaged at Syngenta's Omaha, NE manufacturing site.

Use: Chart herbicide is a selective herbicide used for weed control in soybeans.

Source of Manufacture: Oxasulfuron is manufactured in Switzerland.

There is no domestic source of oxasulfuron.

H.R. 4254: To suspend temporarily the duty on mucochloric acid.

Product: Mucochloric Acid

Description: Mucochloric acid is an intermediate in the production of norflurazon herbicide. It is imported into Clariant Corporation of Mt. Holly, NC for further processing and formulation.

Use: Norflurazon herbicide is used for control of a unique spectrum of broadleaf weeds and grasses in cotton, trees, nuts and vines. In alfalfa, the product controls yellow and purple nutsedge, which are not adequately controlled by other herbicides, and in cranberries, the product fills a unique niche.

Source of Manufacture: Mucochloric acid is imported from Italy.

There is no domestic source of mucochloric acid.

H.R. 4255: To suspend temporarily the duty on azoxystrobin technical

Product: Azoxystrobin technical

Description: Azoxystrobin is the active ingredient in several brands of fungicide marketed by Syngenta, including Heritage fungicide. It is imported into Gowan Milling Company of Yuma, AZ for formulation and packaging.

Use: Azoxystrobin fungicide has a chemical structure based on that of naturally occurring fungicides called strobilurins. It controls plant pathogens from all major fungal groups. It has both protectant and systemic properties, allowing greater flexibility of use than many other fungicides. It has a favorable environmental and ecological profile. Because it is a member of a new class of chemistry, it fits well into resistance management programs when its use is rotated with other fungicides in other classes of chemistry. Because of its broad spectrum of activity and flexibility of use, it fits well in IPM programs.

Source of Manufacture: Azoxystrobin is manufactured in the United Kingdom.

There is no domestic source of azoxystrobin.

H.R. 4256: To suspend temporarily the duty on Flumetralin Technical

Product: Flumetralin Technical

Description: Flumetralin is the active ingredient in Prime® tobacco sucker control product. It is imported into Odom Industries in Mississippi for formulation and packaging.

Use: Prime is a growth regulator used to prevent the growth of suckers (secondary branches) in tobacco. It provides more consistent performance and has longer residual activity than other sucker control products.

Source of Manufacture: Flumetralin is manufactured in Switzerland.

There is no domestic production of flumetralin.

H.R. 4257: To suspend temporarily the duty on Cyprodinil Technical

Product: Cyprodinil

Description: Cyprodinil Technical is the active ingredient in Vanguard fungicide. It is imported into Gowan Milling Company, Yuma, AZ, for formulation and packaging.

Use: Vanguard fungicide is used to control blight, scab and botrytis in apples, grapes, almonds and stone fruit.

Source of Manufacture: Cyprodinil is manufactured in Switzerland.

There is no domestic production of cyprodinil.

H.R. 4258: To suspend temporarily the duty on Lambda Cyhalothrin CS

Product: Lambda-cyhalothrin CS

Description: Lambda-cyhalothrin CS insecticide is an end-use product which contains the active ingredient lambda-cyhalothrin. Lambda-cyhalothrin is in the class of insecticides known as synthetic pyrethroids. Synthetic pyrethroids are based on the chemical structure and biological activity of pyrethrins, which are components of the natural extract pyrethrum, produced from the chrysanthemum plant.

Use: Although lambda-cyhalothrin insecticide is registered for numerous crop and non-crop uses, the CS product is specifically formulated for use in structural pest control, turf, and landscaping, with a broad label showing activity against more than 32 structural arthropod pests, 55 ornamental pests, and more than 23 lawn and turfgrass pests.

Source of Manufacture: Lambda-cyhalothrin CS is manufactured in the United Kingdom.

There is no domestic production of this product.

H.R. 4259: To suspend temporarily the duty on primisulfuron.

Product: Primisulfuron

Description: Primisulfuron is the active ingredient in Beacon herbicide. It is imported into Syngenta's St. Gabriel, LA manufacturing site for formulation and packaging.

Use: Beacon herbicide is used for postemergence weed control in corn. It is used at low rates, and the postemergence use pattern allows growers to wait until weeds have emerged and to treat only those areas of the field with a weed infestation.

Source of Manufacture: Primisulfuron is manufactured in Switzerland.

There is no domestic production of primisulfuron.

H.R. 4260: To suspend temporarily the duty on 1,2-cyclohexanedione

Product: 1,2-cyclohexanedione

Description: 1,2-cyclohexanedione is an intermediate used in the manufacture of mesotrione herbicide. It is imported into Syngenta's Cold Creek, AL manufacturing site, where mesotrione is produced.

Use: Mesotrione is the active ingredient in Callisto herbicide. Mesotrione is a member of a relatively new class of chemistry which provides an effective alternative to traditional herbicides used for broadleaf weed control in corn. Because it is in a different class of chemistry from other corn herbicides, mesotrione fits well in resistance management programs. Mesotrione has a favorable toxicological and environmental profile and was registered by the EPA as a reduced risk product.

Source of Manufacture: 1,2-cyclohexanedione is manufactured in the United Kingdom.

There is no domestic source of this product.

H.R. 4261: To suspend temporarily the duty on Difenoconazole

Product: Difenoconazole

Description: Difenoconazole is the active ingredient used in a number of formulations of seed treatments for cereal products. It is imported into Platte Chemical Company in Greenville, SC.

Use: Formulations containing difenoconazole fungicide either alone or in mixture provide protections from diseases for cereal seeds. Difenoconazole is the only fungicide to control a disease called dwarf bunt. The presence of Dwarf bunt in U.S. wheat causes China to keep U.S. wheat out.

Source of Manufacture: Difenoconazole is manufactured in Switzerland.

There is no domestic production of difenoconazole.