April 15, 2015

Docket # EPA-HQ-OPP-2014-0805

Re: EPA Proposal to Improve Corn Rootworm (CRW) Resistance Management

Subject: Comments to the U.S. EPA's proposal to improve CRW resistance management program currently in place for plant-incorporated-protectants (PIPs) derived from Bacillus thuringiensis (Bt) in corn under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

Dear Sir or Madam:

Syngenta appreciates the opportunity to comment on EPA's CRW resistance management proposal. Like our industry partners who have already provided comment, Syngenta supports a science-based approach to insect resistance management (IRM) and agrees that integrated pest management (IPM) is a key component of resistance management. Crop and trait rotation, multiple modes of action, and soil-, seed- and foliar- insecticides are all choices and tools that the grower needs to succeed in managing CRW.

Considering the great diversity of agronomic practices and other factors influencing US growers farming decisions, it is imperative that growers have the flexibility to choose management practices that fit their specific farming operations. Prescriptive practices or limiting the types of tools for managing corn soil pests will put undue restrictions on growers' operations. For example, crop rotation to a non-host crop, such as soybeans, is a primary tool for CRW management; however, limiting rotation to no more than 2 consecutive years of CRW-Bt corn is not suitable for all corn growing areas or situations. Additionally, EPA's proposal to limit the use of soil-applied insecticides would further restrict the grower's options for effectively managing soil pests. Soil-applied insecticides are a critical component of IPM programs and are used not only to manage CRW, but also other soil pests. Soil pests are a critical concern in US corn production systems and growers need effective management tools; in many instances, these tools need to be used in combination.

US corn growers are currently required to implement IRM plans for all commercial Bt corn products in order to reduce the probability of target pest resistance development. While supplementing IRM programs with IPM is highly recommended and supported, a prescriptive approach with IPM adoption targets eliminates the flexibility growers need to adapt to a dynamic pest environment.

Syngenta is committed to a scientific and pragmatic approach to insect resistance management and will continue to support and promote the use of IRM and IPM best management practices.

Sincerely,

Ponsi Trivisvavet
President of Syngenta Seeds, Inc.

Syngenta is one of the world's leading companies with more than 28,000 employees in over 90 countries dedicated to our purpose: Bringing plant potential to life. Through world-class science, global reach and commitment to our customers we help to increase crop productivity, protect the environment and improve health and quality of life. For more information about us please go to www.syngenta.com or www.syngenta.ch.