JOEL R. JUNKER & ASSOCIATES
ATTORNEYS AT LAW • A PROFESSIONAL CORPORATION
1191 SECOND AVENUE • SUITE 1800
SEATTLE, WASHINGTON 98101
TELEPHONE (206) 621-7878
FACSIMILE (206) 621-8220

June 21, 2012

VIA ELECTRONIC POSTING

House Committee on Ways and Means
Attention: MTB
1102 Longworth House Office Building
Washington D.C. 20515

RE: Written Comments on Tariff Bill H.R. 4488
MCPA 2-ethylhexyl

To Whom It May Concern:

By and through its undersigned attorneys, Nufarm Americas, Inc. respectfully submits the following written comments in support of H.R. 4488, to extend temporarily the suspension of duty on MCPA 2-ethylhexyl.

MCPA 2-ethylhexyl is a plant growth regulator-type herbicide used as an effective control on a wide variety of broadleaved weeds in cereals, grasses, flax, and non-crop areas. MCPA 2-ethylhexyl is an important product for both the herbicide and farming industries in the United States.

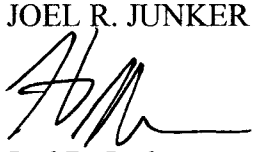
MCPA 2-ethylhexyl is not produced in the United States. Absent any domestic competing product, it is unnecessary to impose a duty on imports of this product, which duty would then have to be passed on to U.S. consumers. Because of this, MCPA 2-ethylhexyl is already the subject of a temporary duty suspension under the United States Manufacturing

Enhancement Act of 2010. This relief expires at the end of 2012; accordingly, Nufarm urges that H.R. 4488 be included in the 2012 Miscellaneous Tariff Bill.

H.R. 4488 is a tariff relief provision; it is not an earmark. Any company importing MCPA 2-ethylhexyl will benefit from the relief provided. It is anticipated that as many as ten or more U.S. companies will benefit directly from H.R. 4488, as will downstream agricultural consumers who will benefit indirectly from the reduced cost.

Respectfully submitted,

JOEL R. JUNKER & ASSOCIATES



Joel R. Junker
Heather Jacobson