

# 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 POST

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. 4489  
Aldicarb

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. 4489, to suspend temporarily the duty on aldicarb.

Aldicarb is a carbamate insecticide. It is effective against a variety of insect pests including thrips, aphids, spider mites, lygus, fleahoppers and leafminers, but is primarily used as a nematicide, to eliminate parasitic nematodes in crops. Aldicarb is currently registered by the U.S. Environmental Protection Agency for use on cotton, peanuts, sugar beets, dry beans, sweet potatoes, and soybeans. It has been described by crop growers as “incomparable” in its effectiveness for controlling destructive crop pests. Multiple products would be needed as an alternative to aldicarb because it is without peer in providing growers with control of many pests from a single application. More than four decades of use have shown aldicarb to control over 75 species of insects and mires as well as over 40 species of harmful nematodes. As an example,

without use of aldicarb on cotton soil fumigants before planting (such as metham sodium or 1,3-dichloropropene), insecticide seed treatments (such as imidacloprid, thiamethoxam and abamectin), and repeated insecticide sprays for the crop (such as acephate and dimethoate) may be needed.

Aldicarb is an important product to the U.S. insecticide and agricultural industries. The sole U.S. producer of aldicarb has in the past year halted production and dismantled its aldicarb production facility. 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. Accordingly, Nufarm urges that H.R. 4489 be included in the 2012 Miscellaneous Tariff Bill.

H.R. 4489 is a tariff relief provision; it is not an earmark. Any company importing aldicarb will benefit directly from the relief provided, as will downstream agricultural consumers who will benefit from the reduced cost.

Respectfully submitted,

JOEL R. JUNKER & ASSOCIATES



Joel R. Junker  
Heather Jacobson