

**CORPORATE OFFICE**

1525 NE 36<sup>th</sup> Street  
Ankeny, Iowa 50021  
515.964.9444 (Phone)  
800.247.8013 (Toll Free)  
515.964.7813 (FAX)

# ALBAUGH, INC

**PLANT**

4900 Stockyards Expressway  
St. Joseph, MO 64504  
816.238.3377 (Phone)  
800.252.2844 (Toll Free)  
816.238.3938 (FAX)

June 19, 2012

VIA E-MAIL

The Honorable Dave Camp  
Chairman  
Committee on Ways and Means  
U.S. House of Representatives

**RE: Comment in Support of a Temporary Suspension of the Duty on Imports of  
Captan, H.R. 5622**

Dear Mr. Chairman:

Albaugh, Inc., is a U.S. owned company with a manufacturing and formulation facility at St. Joseph, Missouri, employing 176 people. Albaugh is dedicated to providing distributors in North America with a constant supply of high quality generic crop protection chemicals which can compete on a global basis.

Albaugh supports enactment of H.R. 5622, a bill to suspend temporarily the duty on Captan. Captan is a fungicide used on a variety of crops, such as apples and fruit crops, and for soil treatments.

Albaugh sells Captan mixtures in ready-to-use formulations to agricultural distributors who resell them to dealers or market them directly to growers through their own retail outlets. Several other companies currently import Captan into the United States, including Makhteshim-Agan of North America, Inc., Arysta LifeScience North America, LLC, and RedEagle International, LLC.

There is no known production of Captan in the United States. The last known producer of Captan, Arvesta Corporation, closed its plant in Ohio in 2003. Captan and Captan formulations are produced in several countries, including the People's Republic of China.

A temporary duty suspension will allow importers of Captan and Captan formulations to remain competitive in a very competitive marketplace. Captan is more or less a commodity and it is priced accordingly. The competition for customers is fierce, and the companies that can offer the lowest cost to customers will most likely end up with the business. In this



PREMIER SUPPLIER OF OFF-PATENT CROP PROTECTION PRODUCTS  
[www.albaughinc.com](http://www.albaughinc.com)

The Honorable Dave Camp

Page 2 of 2

June 19, 2012

environment, where there is no on-shore producer, it makes sense to grant a temporary duty exemption, which no doubt will create additional room for price movements that benefit the consumer.

There are other active ingredients that compete with formulations containing Captan but those active ingredients cannot be substituted for Captan in the Albaugh formulation. Each active ingredient has its own properties and characteristics, such that they may require unique ratios of active ingredient to water and other ingredients in a formulation. Also, each active ingredient, including Captan, has been approved by EPA for application to specific crops at specific application rates, and the crops and rates are not necessarily the same for Captan as for another active ingredient.

The chemical name of Captan is N-((Trichloromethyl)thio)-4-cyclohexene-1,2-dicarboximide (CAS Number 133-06-2). Captan is classified under subheading 2930.90.4390 of the Harmonized Tariff Schedule of the United States. The formulations of Captan Albaugh imports are classified under subheading 3808.92.1500. The nondiscriminatory rate of duty under both subheadings is 6.5%.

Sincerely,



Stuart I. Feldstein

Vice President

cc: International Trade Commission  
Department of Commerce