



August 15, 2015

Susan Lewis  
Director, Registration Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

**Re: Docket EPA-HQ-OPP-2013-0141 – Registration request for the new active ingredient Benzovindiflupyr (Solatenol) for food and non-food use.**

Dear Ms. Lewis,

We appreciate the opportunity to submit comments on the Registration request for the new active ingredient Benzovindiflupyr (Solatenol) for food and non-food use. Access to new active ingredients is essential to the efficient corn production as part of integrated pest management programs to control endemic and emerging pathogens. Incorporating a greater diversity of active ingredients in rotation helps maintain the utility of other active ingredients.

Founded in 1957, NCGA represents approximately 42,000 dues-paying corn growers and the interests of more than 300,000 farmers who contribute through corn checkoff programs in their states. NCGA and its 48 affiliated state associations and checkoff organizations work together to help protect and advance corn growers' interests. NCGA acknowledges all crop protection technology as critical for growers, allowing increased production efficiency and reduced yield loss under stressed conditions.

Solatenol is a promising new broad-spectrum fungicide. Solatenol in combination with azoxystrobin and propiconazole, under the trade name Trivapro, provides three modes of action against damaging rusts, frogeye leafspot, gray leaf spot, Septoria, and others. This synergistic approach helps prevent resistance development by the pathogen, keeping our applications to a minimum and maintaining the effectiveness of existing tools.

We ask that EPA move forward with the approval of Solatenol for use in corn. We appreciate the opportunity to provide comments on this important topic and please do not hesitate to contact us if any questions should arise on this topic.

Sincerely,

A handwritten signature in black ink that reads "Chip Bowling". The signature is written in a cursive, flowing style.

Chip Bowling  
President  
National Corn Growers Association