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Request for Exclusive Use Extension- Pydiflumetofen

Attention: Ms. Heather Garvie and Ms. Lindsay Roe; PM Team 22, Registration Division

Dear Ms. Garvie and Ms. Roe,

Syngenta Crop Protection, LLC, is requesting a three year exclusive use extension for Pydiflumetofen, registered May 23, 2018 as reduced risk for 13 commodities, many of which are minor uses. Specifically, the BEAD document (DP# 437708, PC# 090110) for Pydiflumetofen, dated November 15, 2017, states the following:

“BEAD finds that pydiflumetofen meets the presumption of public interest for minor use (squash, watermelon, cantaloupe, bell pepper, spinach, celery, eggplant, goji berry, okra, endive, parsley, pepino, sunberry, tomatillo) as each of these crops is grown on fewer than 300,000 acres.”

For determining exclusive use extension based on 9 minor crops, EPA allows the number of representative crops that comprise a crop group, i.e., the substitution will be afforded on a one-for-one basis, if all other criteria [FIFRA 3(c)(1)(F)(ii)(I-IV)] for that crop are met (which is the case). If the cited residue trial data are for a major representative crop, then one minor crop within that group may be substituted. Syngenta believes that more than 9 minor crops exist to qualify pydiflumetofen for the 3 year extension from May 23, 2018 (initial registration). Some of these minor uses are listed as follows:

- 1C group (tuber and corm) (Rep. crop is potato)
 - Group includes ginger as minor use
- Crop Subgroup 6C. Dried shelled pea and bean (except soybean)(Rep. Commodity: one dried cultivar of bean (*Phaseolus* spp.); and any one dried cultivar of pea)
 - Group includes kidney bean and lentil (or chickpea)
- Fruiting veg 8-10 (Rep commodities: Tomato, standard size, and one cultivar of small tomato; bell pepper and one cultivar of small nonbell pepper).
 - Group includes minor uses bell pepper, eggplant, okra (or goji berry or sun berry or tomatillo)
- Group 4-16A (Rep commodities: Head lettuce, leaf lettuce, and spinach)
 - Minor uses in this group: spinach and endive
- Cucurbit Crop Group 9 (Rep. Commodities: Cucumber, muskmelon, and summer squash)

- Group includes minor uses squash, cantaloupe, and watermelon
- Group 13-07F (Rep. Commodity Grape)
 - Includes Amur river grape
- Group 20A (Rep. Commodity rapeseed variety)
 - Minor use includes rapeseed.
- Group 22B- leafy petioles (Rep. commodity celery)
 - Includes minor use celery
- Also received uses for quinoa (and oats, rye)

Additionally, Syngenta believes that all the pertinent criteria outlined in FIFRA 3(c)(1)(F)(ii) have been satisfied.

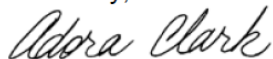
Because these uses were determined to be reduced risk by EPA, Syngenta believes that all of the following criteria have been met:

(I) The alternatives to the minor use pesticide pose greater risks to the environment or human health;

(II) The minor use pesticide plays or will play a significant part in managing pest resistance; or

(III) The minor use pesticide plays or will play a significant part in an integrated pest management program.

Sincerely,



Federal Team Lead, Fungicides
Syngenta Crop Protection, LLC