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August 15, 2006

VIA ELECTRONIC TRANSMISSION

Senate Finance Committee
Attention: MTB
219 Dirksen Senate Office Building
Washington, DC, 20510

RE: Written Comments on Tariff Bill S. 3158
To suspend temporarily the duty on 2-Methyl-4-chlorophenoxyacetic acid, salts,
and esters ("MCPA").

Dear Sir/Madam:

Nufarm Americas, Inc. respectfully submits through counsel the following written comments in support of S. 3158, to suspend temporarily the duty on 2-Methyl-4-chlorophenoxyacetic acid ("MCPA"), salts, and esters.

MCPA and its salts and esters are not produced in the United States. Despite the absence of any domestic competing product, duties are imposed on imports of these products, which duty then is passed on to U.S. consumers in the U.S. agricultural market. To eliminate these unnecessary and avoidable manufacturing costs to its customers, Nufarm America's supports temporary suspension or reduction of duties on MCPA.

Further, S. 3158 includes all forms of MCPA in one bill, and is identical to the tariff measures regarding MCPA that have been included in the last two omnibus tariff bills. By contrast, other tariff measures currently before Congress with respect to MCPA address the product in a piecemeal fashion, splitting the acid, salt and ester forms into separate bills.

Accordingly, Nufarm urges that S. 3158 be included in the 2007 Miscellaneous Tariff Bill.

Respectfully submitted,

JOEL R. JUNKER & ASSOCIATES

/s/

Joel R. Junker