



February 2, 2010

U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Docket ID: APHIS-2009-0072

Docket Title: Draft EA and Petition for Determination of Non-regulated Status for Corn Genetically Engineered for Insect Resistance

Dear Sir or Madam:

The Independent Professional Seed Association (IPSA) offers this letter of support for the timely deregulation of Syngenta's Agrisure Viptera trait associated with the docket number listed and title listed above. IPSA represents independent, regional seed companies located throughout the United States and Canada who constantly strive to offer farmers a broad choice of products in the agricultural seed marketplace.

There are a variety of reasons why IPSA and its members support this deregulation in a timely fashion:

- Agrisure Viptera contains a novel protein that has been shown to effectively control the insects of the multi-species complex, a collection of pests that can cause significant damage and economic losses for farmers.
- A secondary benefit of controlling the multi-species complex is the likelihood of reduced mycotoxin levels. Mycotoxins, which can be harmful to animals and humans at concentrations above acceptable levels, proliferate when plant tissue is stressed and damaged by insects from the multi-pest complex.
- This deregulation would allow for reduced refuge acres to 20% nationwide, a big boost to southern farmers who have been attempting to increase corn acres, but have been subjected to 50% refuge requirements with biotech products currently available in the marketplace.
- The deregulation allows for the introduction of a completely new protein with a different mode of action to other products on the market. This helps to prevent insects from developing disease resistance to ANY products on the market, and extend the durability of all current products on the market.
- At the end of the day, the Agrisure Viptera trait provides one more choice for farmers to have when making their seed purchasing decisions – and one more option in the marketplace for seed companies.

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The members of the Board of Directors of the Independent Professional Seed Association, on behalf of the Association's members, respectfully request that the Agrisure Viptera trait be deregulated in a timely manner, in order that farmers across the country (and consumers around the globe) might benefit from this novel new trait.
(IPSA Board action taken to approve this position on January 21, 2010)

If you have questions, or would like to discuss our letter or position in greater detail, please feel free to contact the Association at the address, phone number or email address listed below. Thank you for your time and consideration regarding this amendment.

Sincerely,

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