U.S. Environmental Protection Agency
Document Processing Desk
Office of Pesticide Programs (7504P)
Room S4900, One Potomac Yard
2777 Crystal Drive Arlington, VA 22202

Emily Schmid
Product Manager, Team 25
Herbicide Branch

Subject: Letter of Authorization to Refer to Bayer CropScience LP Dicamba Data for Syngenta Crop Protection, Inc. Registration of A21472 Plus VaporGrip® Technology

October 23, 2020

Thomas B. Orr
Broad Acre and Trait Use Lead
Crop Protection Regulatory Affairs

Bayer Crop Science Division
Bayer CropScience LP

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Dear Emily;

Bayer CropScience LP ("Bayer") herby authorizes the United States Environmental Protection Agency (EPA) to refer to the Bayer Data (as defined below in Section 1) in support of Syngenta Crop Protection, Inc. ("Syngenta") application for registration of A21472 Plus VaporGrip® Technology herbicide containing dicamba diglygolamine (DGA), s-metolachlor and VaporGrip® ("Syngenta Premix Product") and solely for the uses described below in Section 2.

1. Bayer Data covered by this Letter of Authorization: Registration data, including safety and efficacy data, that pertain to dicamba DGA salts and those DGA salt formulations containing VaporGrip® that were submitted prior to October 16, 2020 that pertain to any and all uses in or on or over the top of dicamba tolerant soybean or cotton crops.
2. Use authorized by this Letter of Authorization: This authorization in granted solely to allow Syngenta to support the registration, within the United States only, with the EPA, of the Syngenta Premix Product, for use in or on or over the top of dicamba tolerant soybean and cotton.

Syngenta has no ownership interest whatsoever in any of Bayer's Data. This letter is not and shall not be construed as an authorization to refer to or cite the Bayer Data, directly or indirectly, in support of any other application submitted by Syngenta or any other applicant for any other purpose, including, but not limited to, applications for new or amended registrations or distributor products. This letter does not authorize the EPA to refer to any other data or information submitted by Bayer in connection with any other application, notification or submission. This letter does not authorize EPA to allow Syngenta to have access to or to

review any Bayer Data or any other data submitted by Bayer. Furthermore, this letter is not a waiver of any of Bayer's rights in the referenced Bayer Data or to compensation for the right to cite these Bayer Data, nor may these Bayer Data be referenced or cited by other governmental regulatory agencies not previously authorized by Bayer in writing.

Yours sincerely,

Bayer U.S. – Crop Science Division
Bayer CropScience LP

Thomas B. Orr
Broad Acre and Trait Use Lead
Crop Protection Regulatory Affairs

Cc:
Mr. Montague Dixon / Syngenta Crop Protection
Mr. Thomas Marvin / Bayer CropScience LP