

October 13, 2021

Tracy Perry
Pesticide Re-Evaluation Division (7508P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

Submitted electronically via Federal eRulemaking Portal

RE: Request for Comment Period Extension for “National Level Threatened and Endangered Species Biological Evaluations for Clothianidin, Imidacloprid and Thiamethoxam” (EPA-HQ-OPP-2021-0575)

Dear Ms. Perry,

We are writing to respectfully request that EPA extend the comment period for the draft biological evaluations (BE) for clothianidin, imidacloprid, and thiamethoxam. As the Agency is aware, these evaluations are lengthy, complex assessments. To ensure we can provide EPA with the best feedback possible as the Agency works to finalize the BEs, we request a 45-day extension of the comment period for the draft BEs for these three chemistries.

As EPA knows, the draft BEs are lengthy and complex. Each draft BE and their appendices contain hundreds of pages of material. For stakeholders who have an interest in all three chemistries, this equates to reviewing more than a thousand pages of material to prepare a response. Furthermore, these chemistries have unique uses compared with other chemistries for which the Agency has previously prepared draft BEs. For example, these chemistries have significant seed treatment uses which has not been the case with other chemistries. This poses more intricate considerations that stakeholders will want to comment regarding and on which EPA may appreciate feedback, however collecting and preparing this additional information takes time.

Since the implementation of the revised method, we are unaware of any draft BEs for which the Agency has not yet granted a comment period extension, largely due to the complexity and length of the evaluations. Extensions were granted for those single chemistry draft BEs. In this instance, stakeholders are being asked to comment on assessments for not one, but three chemistries simultaneously. More time is needed to provide the Agency the quality feedback it seeks.

Thank you in advance to your consideration of this 45-day comment period extension request. We look forward to the opportunity of providing EPA with meaningful, quality feedback on these draft BEs which would be better facilitated with a comment period extension.

Sincerely,

Agricultural Retailers Association
American Farm Bureau Federation
American Seed Trade Association
American Soybean Association
American Sugarbeet Growers Association

California Specialty Crops Council
Cherry Marketing Institute
Council of Producers and Distributors of Agrotechnology
Georgia Fruit and Vegetable Growers Association
Kansas Agribusiness Retailers Association
Illinois Fertilizer and Chemical Association
Michigan Vegetable Council
Minnesota Crop Production Retailers
Montana Agricultural Business Association
National Agricultural Aviation Association
National Alliance of Independent Crop Consultants
National Association of Wheat Growers
National Cotton Council
National Council of Farmer Cooperatives
National Onion Association
National Potato Council
National Sorghum Producers
National Sunflower Association
Society of American Florists
South Dakota Agri-Business Association
U.S. Canola Association
United States Peanut Federation
USA Rice
Washington Blueberry Commission
Washington Friends of Farms & Forests