



4201 Wilson Blvd. • Suite 700 • Arlington, VA 22203

T 202.457.0825 • F 202.463.0474 • www.aradc.org

January 29, 2026

Nathalie Bray
Pesticide Registration Division (7505T)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Conservation_Programs@epa.gov

Submitted via Regulations.gov

RE: Request for Extension of Public Comment Period — Agency Information Collection Activities; Proposals, Submissions, and Approvals: Process To Become an EPA Qualified Conservation Program and Qualified External Party; Draft Pesticide Registration Notice; Docket No. EPA-HQ-OPP-2025-1906.

Dear Ms. Bray:

The Agricultural Retailers Association (ARA) respectfully requests a 60-day extension to the current March 6, 2026, deadline for submitting public comments on EPA's draft Pesticide Registration Notice concerning the process to become an EPA-Qualified Conservation Program and Qualified External Party. This timing—outlined in the docket materials presently available to stakeholders—does not provide sufficient opportunity for the agricultural retail sector to prepare comprehensive, technically grounded feedback.

Statement of Interest

Established in 1992, ARA represents agricultural retailers, agricultural cooperatives, and independent businesses that supply America's farmers with crop inputs, crop protection products, agronomic services, and conservation-focused technical expertise. Our members play a significant role in helping growers adopt science-based stewardship practices that protect natural resources while maintaining productive, resilient agricultural systems.

Role of Agricultural Retailers and Certified Crop Advisers in Conservation Planning

Agricultural retailers and their Certified Crop Advisers (CCAs) play an essential on-the-ground role in helping farmers understand, adopt, and maintain conservation practices. Many CCAs working within ARA member companies are also certified as Technical Service Providers (TSPs) through USDA's Natural Resources Conservation Service. In this capacity, they assist growers in developing and implementing conservation plans, nutrient management strategies,

integrated pest management approaches, and resource-protection practices tailored to local agronomic and environmental conditions.

Because these retail agronomists work directly with growers throughout the year, they are often the most trusted and accessible advisers available to explain program requirements, identify practical solutions, and help maintain long-term stewardship practices. Their experience with field-level conservation planning gives them valuable insight into how EPA's proposed qualification standards may affect day-to-day implementation and grower participation.

Given this unique role, ARA believes it is especially important that retailers, CCAs, and TSPs have adequate time to review the technical details of the draft Pesticide Registration Notice and assess how the proposed criteria align with the conservation planning systems already in place across agricultural operations. Additional time will allow these experts to provide EPA with realistic, experience-based feedback that ensures the Agency's final framework is workable and effective for both growers and conservation practitioners.

Need for Additional Time

A 60-day extension is necessary for several reasons:

1. Coordination Across a Diverse Membership

ARA's membership covers a wide range of agricultural geographies, cropping systems, and conservation practices. Preparing meaningful comments requires input from retailers, certified crop advisers, agronomists, precision agriculture specialists, and conservation program implementers across the country.

2. Engagement with External Stakeholders

Delivering well-informed recommendations requires consultation with growers, landowners, conservation districts, and technical service providers—all of whom will be directly affected by EPA's proposed qualification processes.

3. Technical Complexity of EPA's Draft Materials

The draft registration notice includes detailed criteria for evaluating applications to become Qualified Conservation Programs; procedural requirements for entities seeking Qualified External Party status; and specific questions from EPA that call for granular analysis.

Value of an Extension

Granting the requested 60-day extension would promote robust stakeholder participation; ensure submissions are accurate, representative, and analytically sound; and improve the clarity,

feasibility, and long-term durability of EPA's eventual qualification framework. ARA is committed to constructive engagement, and additional time will materially improve the quality of our recommendations.

If you have questions or would like to discuss this request further, please contact me at richard@aradc.org or 202-595-1699.

Sincerely,

A handwritten signature in blue ink that reads "Richard D. Gupton". The signature is fluid and cursive, with "Richard" and "D." on the first line and "Gupton" on the second line.

Richard Gupton
Senior Vice President, Public Policy & Counsel
Agricultural Retailers Association

CC:

Ed Messina, Director, OPP, EPA

Nancy B. Beck, Principal Deputy Assistant Administrator, OCSPP, EPA

Amy Blankenship, Acting Division Director, EFED, EPA

Gina Schultz, Deputy Assistant Director, USFWS

Lisa Marie Carruba, Acting Division Chief, NMFS Office of Protected Resources

Clayton Myers, Senior Entomologist, USDA OPMP