



PPC

PESTICIDE POLICY COALITION

A Coalition Working for Sound Pest Management Policies

February 9, 2024

EPA Docket Center
Office of Research and Development (ORD) Docket
U.S. Environmental Protection Agency
Mail Code 28221T
1200 Pennsylvania Ave. N.W.
Washington, DC 20460-0001

Submitted via regulations.gov EPA-HQ-ORD-2023-0240

Re: Scientific Integrity Policy Draft for Public Comment – Docket ID: EPA-HQ-ORD-2023-0240 - REQUEST FOR EXTENSION TO COMMENT PERIOD

The Pesticide Policy Coalition (PPC) respectfully requests a 90-day extension to the comment period on the U.S. Environmental Protection Agency's (EPA) request for public comment on the Scientific Integrity Policy Draft for Public Comment published January 24, 2024, in the Federal Register.

The PPC is an organization of food, agriculture, forestry, pest management, and related industries, including small businesses/entities, which are dependent on the availability of pest management tools. PPC members include nationwide and regional farm, commodity, specialty crop, and silviculture organizations; cooperatives; food processors and marketers; pesticide manufacturers, formulators, and distributors; pest- and vector-control applicators and operators; research organizations; equipment manufacturers; and other interested stakeholders. PPC serves as a forum for review, discussion, development, and advocacy around pest management regulation and policy. Our coalition supports development and implementation of public policies and laws that utilize the best available science and technology to ensure protection of human health and the environment.

EPA is seeking comments on its policy draft on scientific integrity, which would update EPA's policies to enhance and promote a continuing culture of scientific integrity. The PPC views this effort as important especially as pest management decisions by EPA necessarily involve often complex scientific issues and Agency assessment policies dependent on sound scientific

foundations to ensure public trust in decisions. As such, the PPC has strong interest in EPA's science assessments and the underlying integrity of its foundational policies.

EPA's policy draft covers a very wide range of topics described in the document, including protecting scientific processes; reviewing science; use of Federal Advisory Committees; ensuring the free flow of scientific information, supporting decision-making processes; ensuring accountability; protections for EPA employees; and professional development of EPA scientists. These topics, and how EPA will address them as part of its operating procedures, are important to the PPC given our strong interest in how EPA conducts its scientific work.

As a result, PPC respectfully requests EPA to extend the public comment period by 90 days to allow us to gather and submit additional information to develop more fully comments on this wide-ranging set of topics. Should you have any questions about our request, please feel free to contact: Steve Hensley at shensley@cotton.org or (703) 475-7716 and Megan Provost at mprovost@pestfacts.org or (202) 570-3551.

Thank you for considering our views. If PPC members can be of assistance in any way, please do not hesitate to contact us.

Sincerely,



Steve Hensley
Chair, Pesticide Policy Coalition



Megan J. Provost
Vice Chair, Pesticide Policy Coalition

Pesticide Policy Coalition Members

ADAMA	National Alliance of Forest Owners
Agricultural Retailers Association	National Alliance of Independent Crop Consultants
American Chemistry Council, Biocides Panel	National Association of Landscape Professionals
American Farm Bureau Federation	National Association of State Departments of Agriculture
AmericanHort	National Associations of Wheat Growers
American Mosquito Control Association	National Corn Growers Association
American Mushroom Institute	National Cotton Council
American Seed Trade Association	National Farmers Union
American Soybean Association	National Onion Association
American Sugarbeet Growers Association	National Pest Management Association
American Vanguard	National Potato Council
Association of Equipment Manufacturers	North Dakota Grain Growers Association
BASF Corporation	Northwest Horticultural Council
Bayer Crop Science	RISE
California Citrus Quality Council	Scotts Miracle Gro
California Prune Board	Society of American Florists
California Farm Bureau	Syngenta Crop Protection
California Processed Onions Garlic Research Committee	U.S. Apple Association
California Specialty Crops Council	U.S. Beet Sugar Association
Corteva	U.S. Canola Association
Council of Producers & Distributors of Agrotechnology	U.S. Hop Industry Plant Protection Committee
CropLife America	United Fresh Produce Association
Florida Fruit & Vegetable Association	USA Rice
FMC	Valent U.S.A Corporation
Golf Course Superintendents Association	Washington State Potato Commission
Gowan	Western Growers
ISK Bioscience	Wilbur-Ellis Company
Minor Crop Farmer Alliance	
National Agricultural Aviation Association	