



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

October 29, 2015

Via Electronic Submission: <http://www.regulations.gov>

Mr. Jack Housenger
Director, Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-001

**Re: Docket ID No. EPA-HQ-OPP-2011-0183; RIN: 2070-AJ20
Pesticides: Certification of Pesticide Applicators**

Dear Mr. Housenger,

The Pesticide Policy Coalition (“PPC” or the “Coalition”) hereby formally requests that the Environmental Protection Agency (“EPA” or the “Agency”) allow an additional 60 days, at a minimum, to respond to EPA proposed rule *Pesticides: Certification of Pesticide Applicators* issued on August 24, 2015 [EPA Docket ID No. EPA-HQ-OPP-2011-0183].

PPC is an organization that represents food, agriculture, pest management and related organizations that support transparent, fair and science-based regulation of pest management. 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 operators and applicators, research organizations, and other interested parties. PPC serves as a forum for the review, discussion, development and advocacy of pest management policies and issues important to its members.

The proposed rule is an expansive overhaul of pesticide certification and training standards that have been effectively implemented by individual U.S. states, tribal areas and territories for the past 40 years. The rule proposes significant changes to: application categories, testing procedures, supervision of non-certified applicators, training of non-certified applicators, minimum age requirements, recertification requirements, reciprocity and criminal/civil liabilities. The proposed rule will have a significant impact on those that use, produce and regulate pesticides throughout the nation.

Due to the large scope and significant impact of the proposed rule the PPC believes that an extension of the comment period by *at least* 60 days will better enable all interested stakeholders the necessary time to analyze and interpret the proposed rule. This additional time, if granted, would provide stakeholders the opportunity to submit thoughtful comments on EPA's proposal while offering alternatives that may enhance and strengthen the proposed rule. PPC members view this proposed rule as an opportunity to work with the Agency and our state regulatory partners to ensure the safe use of pesticides while minimizing unnecessary and costly burdens to pesticide manufacturers, applicators and other affected parties; at the same time also limiting costs to state regulators already operating with limited resources.

PPC members possess a diverse wealth of knowledge concerning pesticides and we are continuing to discuss, interpret, study and analyze the impacts of the proposed rule. We are actively engaging our membership and state regulators concerning the impacts of this rule, and there still remain several questions and differing opinions. There are many facets to this rule which will have varying effects and impacts. The proposed 90 day comment period is simply not a realistic timeframe to adequately allocate the necessary resources to properly provide thoughtful and informative comments on this rule. The Agency has provided a large sum of resources towards this proposed rule for over a decade and it is our belief that affected stakeholders, in contrast, should be afforded more than the currently allotted 90 days.

For the reasons stated herein the PPC respectfully requests the comment period for *Pesticides: Certification of Pesticide Applicators* [EPA Docket ID No. EPA-HQ-OPP-2011-0183] issued August 24, 2015, be extended for at least an additional 60 days.

We appreciate your immediate consideration of this request and look forward to your response. If you have any question or need further information, please feel free to contact us.

Sincerely,



Lisa K. Van Doren
Chair, Pesticide Policy Coalition



Beau Greenwood
Vice Chair, Pesticide Policy Coalition