



# PPC

**PESTICIDE POLICY COALITION**  
A Coalition Working for Sound Pest Management Policies

October 20, 2023

Susan Bartow  
Chemical Review Manager  
Pesticide Reevaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

*Submitted via regulations.gov.*

**Re: Docket EPA-HQ-OPP-2023-0420; Pesticides: Review of Requirements Applicable to Treated Seed and Treated Paint Products; Request for Information and Comments**

Dear Ms. Bartow:

The Pesticide Policy Coalition (PPC) respectfully requests a 60-day extension to the comment period on the Environmental Protection Agency's (EPA or the Agency) *Review of Requirements Applicable to Treated Seed and Treated Paint Products*.

The PPC represents agriculture, food, fiber, public health, pest management, landscape, environmental, and related industries, including small businesses/entities, which are dependent on the availability of pesticides. Our coalition supports development and implementation of public policies and laws that utilize the best available science and technology in ensuring protection of human health and the environment.

PPC members include national and regional trade associations; 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; state departments of agriculture; equipment manufacturers, and other interested stakeholders. The PPC serves as the unifying voice for the review, discussion, development and advocacy around pest management regulation and policy.

The public is increasingly confronted with pest pressure and disease threats introduced into the United States via trade, weather, and other factors. It's through pest control products, used by farmers, ranchers, public health officials, and other pesticide applicators; and produced by pesticide manufacturers, that we can address these threats. These products are essential tools for

users to protect not only America's food, fiber, and biofuel; but to also protect our public health, infrastructure, and environment.

The PPC and other interested stakeholders must have adequate time to gather the requested information on storage, planting, and disposal of treated seed and on whether or to what extent treated seed products are being distributed, sold, and used contrary to treating pesticide and treated seed product labeling instructions. The current comment period does not allow sufficient time to gather the requested information.

Additionally, there are concurrent open dockets on which the PPC and other relevant stakeholders will also submit substantive comments, including EPA's Draft Herbicide Strategy, Draft Guidance for New Outdoor Use Registrations, and the Proposed Antimicrobial Resistance Framework.

The PPC respectfully requests an extension to the public comment period of 60 days to allow all stakeholders an opportunity to develop and submit comments on these important proposed changes. If PPC members can be of assistance in any way, or if you have questions, please do not hesitate to contact me at [shensley@cotton.org](mailto:shensley@cotton.org) or (703) 475-7716.

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive, flowing style.

Steve Hensley  
Chair, Pesticide Policy Coalition

Attachment: Pesticide Policy Coalition Membership List

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