



# PPC

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

July 20, 2023

Mary Ross  
Director  
Office of Science Advisor, Policy, and Engagement  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

*Submitted via regulations.gov*

**Re: Docket EPA-HQ-ORD-2013-0292; Cumulative Risk Assessment Guidelines for Planning and Problem Formulation**

Dear Ms. Ross:

The Pesticide Policy Coalition (PPC) supports the Environmental Protection Agency's (EPA or the Agency) efforts to develop a robust, science-based framework for Cumulative Risk Assessment (CRA) Guidelines for Planning and Problem Formulation. Given the scientific advancements since the last CRA was developed in 2003, we respectfully request a 90-day extension to the comment period, to allow for meaningful review.

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.

As shared earlier, science in the two decades since the last CRA guidelines were developed has significantly advanced. The PPC intends to use the additional time requested to convene experts in exposure, toxicology, and other disciplines to fully review EPA's proposed guidelines.

Finally, the Agency has several open comment periods that are of interest, not only to the PPC, but to many other stakeholders as well. To ensure the Agency receives constructive feedback an extension is essential. The PPC respectfully requests an extension of 90-days, to allow all stakeholders an opportunity to 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 cursive script that reads "Steve Hensley".

Sincerely,  
Steve Hensley  
Chair, Pesticide Policy Coalition

Attachment