



PPC

PESTICIDE POLICY COALITION
A Coalition Working for Sound Pest Management Policies

September 28, 2023

Susan Jennings
Senior Advisor for Public Health
Office of Pesticide Programs
Environmental Protection Agency
10201 Constitution Ave NW
Washington, DC 20004

Submitted via [Regulations.gov](https://www.regulations.gov)

Re: Docket EPA-HQ-OPP-2023-0445; Pesticides: Concept for a Framework to Assess the Risk to the Effectiveness of Human and Animal Drugs Posed by Certain Antibacterial or Antifungal Pesticides

Dear Ms. Jennings:

The Pesticide Policy Coalition (PPC) respectfully submits a request for a 60-day extension to the comment period on the Environmental Protection Agency's (EPA or the Agency), *Concept for a Framework to Assess the Risk to the Effectiveness of Human and Animal Drugs Posed by Certain Antibacterial or Antifungal Pesticides*.

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.

Antimicrobial resistance (AMR) is a complex subject and comment development requires coordinating with a variety of experts and stakeholders for meaningful input. To develop substantive comments and answer EPA's questions, the PPC must ensure that the framework is appropriately defined and clear; what factors should be considered whether a pesticide could potentially cause a risk to human and animal health due to AMR; effective strategies to reduce the potential for pesticides to select for resistant microbes; pathogenic mechanisms; and currently available mitigation strategies.

Additionally, there are several other ongoing comment periods at this time on which the PPC will also submit substantive comments, including the EPA draft Endangered Species Herbicide Strategy, EPA's draft New Use Policy, and other open dockets. The potential government shutdown will also limit the PPC's interaction with EPA if there are questions.

To ensure the Agency receives constructive feedback an extension is essential. The PPC respectfully requests an extension of 60 days, to allow all stakeholders an opportunity to submit comments on this important framework document. 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 or (703) 475-7716.



Sincerely,
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	