

July 26, 2022

Anna Romanovsky,  
Pesticide Re-Evaluation Division (7508P),  
Office of Pesticide Programs,  
U.S. Environmental Protection Agency,  
1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

*Submitted via regulations.gov*

**Re: Petition to Revoke Tolerances and Cancel Registrations for Certain Organophosphate Uses; EPA-HQ-OPP-2022-0490 -- REQUEST FOR EXTENSION TO COMMENT PERIOD**

Dear Ms. Romanovsky:

The undersigned organizations respectfully request a 90-day extension to the comment period on the U.S. Environmental Protection Agency's (EPA) request for public comment on a November 2021 petition requesting that the Agency revoke all tolerances and cancel all associated registrations for certain organophosphate pesticides (OPs).

The undersigned organizations represent agriculture, food, fiber, public health, pest management, landscape, environmental, and related industries, including small businesses and state departments of agriculture, who support sound science and the risk-based regulation of pesticides.

EPA is seeking comments on a November 2021 petition to revoke all tolerances and cancel all associated registrations for food uses for OPs, as well as a request for EPA to complete registration review on the OP class of chemicals by October 1, 2022. OPs are one of the few remaining classes of chemistry that is a broad-spectrum insecticide, which is an essential tool in integrated pest management programs. OPs protect crops from a wide range of insects, prolong the life of crops, and increase productivity. The continued availability of this group of pesticides is important to U.S. growers due to the safety and effectiveness of these proven pesticides.

This request to revoke tolerances for an entire class of chemicals is unprecedented. There are 15 active ingredients in this petition, some with several registered uses that impact a number of stakeholders, who will need sufficient time to thoroughly review and comment on this petition. The members of our organizations depend on the timely availability of safe and effective crop protection and pest control tools to support sustainable food and fiber production. In addition, public health depends on the continued availability of OPs to prevent against the spread of mosquito borne diseases and protect against the increasing threat of invasive species. The availability of a variety of pesticides is also a critical component in the management of pesticide resistance.

The length of time to comment of 30 days is not sufficient for our organizations to provide the substantive comments to EPA on this petition.

As a result, we respectfully request that EPA extend the public comment period by 90 days to allow us to gather and submit additional information in response to this comment development opportunity.

Thank you for considering this request. If you have any questions, please do not hesitate to contact us.

Sincerely,

Agricultural Retailers Association  
American Farm Bureau Federation  
American Mosquito Control Association  
American Soybean Association  
American Sugarbeet Growers Association  
California Citrus Quality Council  
California Specialty Crops Council  
Council of Producers & Distributors of Agrotechnology  
Golf Course Superintendents Association of America  
International Fresh Produce Association  
Minor Crop Farmer Alliance  
National Agricultural Aviation Association  
National Alliance of Independent Crop Consultants  
National Association of Landscape Professionals  
National Association of State Departments of Agriculture  
National Association of Wheat Growers  
National Barley Growers Association  
National Cotton Council  
National Council of Farmer Cooperatives  
National Onion Association  
National Pest Management Association  
National Potato Council  
National Sorghum Producers  
North Dakota Grain Growers Association  
Oregonians for Food & Shelter  
U.S. Beet Sugar Association  
U.S. Canola Association  
USA Rice  
Washington State Potato Commission