



# PPC

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

December 16, 2022

Melanie Biscoe  
Pesticide Reevaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

**Submitted via regulations.gov Re: ESA WORKPLAN UPDATE: Nontarget Species Mitigation for Registration Review and Other FIFRA Actions; EPA-HQ-OPP-2022-0908**

Dear Ms. Biscoe:

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) ESA WORKPLAN UPDATE: Nontarget Species Mitigation for Registration Review and Other FIFRA Actions; EPA-HQ-OPP-2022-0908.

The PPC is an organization of food, agriculture, forestry, pest management and related industries, including small businesses/entities, which are dependent on the availability of pest management tools. 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 applicators and operators; research organizations; equipment manufacturers and other interested stakeholders. PPC serves as a forum for the review, discussion, development and advocacy around pest management regulation and policy.

We appreciate the Agency providing 75 days to comment; however, this is primarily to accommodate Thanksgiving and the holiday season. As you know, the Endangered Species Act (ESA) Workplan update is a major step in EPA's strategy to improve the ESA review process and includes a new direction of using ESA mitigations in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)-portion of pesticide review (FIFRA Interim Ecological Mitigations). The workplan update is complex, includes major label language update for mitigation perspective, and requires the consideration and review of several experts and stakeholders familiar with the subject matter. Given that these updates present new approaches to avoiding jeopardy or adverse modification of habitat for species listed under ESA and may significantly modify how farming is done today, it is incumbent upon the Agency to ensure that all parties can

learn about the proposed changes, understand their content, and formulate meaningful feedback. Therefore, the current comment period does not provide PPC with sufficient opportunity to review the proposed revisions, solicit input from its members, and develop constructive comments.

PPC respectfully requests an extension to the public comment period by 60 days to allow us to gather and submit comments on these important proposed changes. Should you have any questions or comments, please feel free to contact Steve Hensley, chair of the PPC, at [shensley@cotton.org](mailto:shensley@cotton.org) or (703) 475-7716.

Thank you for considering our views. If PPC members can be of assistance in any way, please do not hesitate to contact us.

A handwritten signature in black ink that reads "Steve Hensley". The signature is written in a cursive style with a large, sweeping "S" and "H".

Sincerely,  
Steve Hensley  
Chair, Pesticide Policy Coalition