

compliment the current expertise of various Science Review Board members added to serve on specific FIFRA SAPs. His past experiences on SAPs with EPA on pesticide and metal fate, effects and risk assessment make a significant contribution toward the productivity of the FIFRA SAP.

CropLife America supports the nomination of Dr. Charlene McQueen to serve on the FIFRA SAP. Dr. McQueen would provide unique scientific expertise on the role of genetic variation in response to chemicals, via her expertise in pharmacology and toxicology including pharmacogenomics, toxicogenomics and chemical carcinogenesis.

CropLife America supports the nomination of Dr. Coby Schal to serve on the FIFRA SAP. Dr. Schal is an expert in entomology and pest management, and therefore provides unique expertise among the SAP peers. He has experience and a past record of accomplishment and leadership in academia, industry and with EPA on urban entomology including integrated solutions to such pests as bed bugs and cockroaches.

CropLife America recommends that Dr. Deborah Cory-Slechta not be selected to serve on the FIFRA SAP. Dr. Cory-Slechta generally projects an anti-pesticide advocacy through her research program. Her research interpretations and views inappropriately identify causal effects without quality data, between pesticides and various diseases, notably neurodevelopmental diseases including Parkinson's.

Further, CropLife America recommends that Dr. Timothy Gross and Dr. Mark Harwell not be selected to serve on the FIFRA SAP. These individuals do meet the same level as other nominees with respect to having "sufficient professional qualifications, including training and experience, to provide expert advice and recommendation to the Agency" (75 FR 46919, August 4, 2010).

We look forward to working with EPA in the future and appreciate the opportunity to comment. If there are further questions, please contact me (Dr. Barbara P. Glenn, 202 - 833 - 4474; [[HYPERLINK "mailto:zglenn@croplifeamerica.org"](mailto:zglenn@croplifeamerica.org)]).

Sincerely,



Barbara P. Glenn, Ph.D.
Vice President
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Attachment