



September 3, 2010

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Submitted to Federal e-rulemaking Portal

Dr. Frank Sanders

Director, U.S. EPA
Office of Science Coordination and Policy
USEPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N. W.
Mail Code: 7201M
Washington, DC 20460

Re: Docket ID No. EPA-HQ-OPP-2010-0565. Nominations to the FIFRA Scientific Advisory Panel; Request for Comments. 75 FR 46919. August 4, 2010.

Dear Dr. Sanders:

CropLife America (CLA) is pleased to submit comments in response to the Nominations to the Federal Insecticide Fungicide and Rodenticide Act (FIFRA) Scientific Advisory Panel (SAP) and Request for Public Comments. CLA is the not-for-profit trade organization representing the nation's developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the U.S. Our member companies produce, sell and distribute virtually all the crop protection technology products used by American farmers. CLA comments on issues that can have broad regulatory implications.

?As the current chair of the FIFRA SAP is rotating off, CropLife America recommends that Dr. xxxx is a qualified chair for the FIFRA SAP.

CropLife America supports the nomination of Dr. Lawrence Barnthouse to serve on the FIFRA SAP. Dr. Barnthouse is an expert on population biology and ecological risk assessment. He was instrumental in development of EPA's framework for environmental risk assessment while working at the Department of Energy. His professional leadership activities indicate his preeminence in the field. Dr. Barnthouse has a demonstrated an understanding of pesticide issues and therefore he would be a valuable and essential addition to the SAP, complimenting the expertise of other members.

CropLife America supports the nomination of Dr. Stephen J. Klaine to serve on the FIFRA SAP. Dr. Klaine has a long history of being involved with ecotoxicology and metals issues that face industry. He understands the regulatory perspective and data requirements for their practical application to fulfilling pesticide regulations. This would

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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 not 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:bglenn@croplifeamerica.org"](mailto:bglenn@croplifeamerica.org)]).

Sincerely,



Barbara P. Glenn, Ph.D.
Vice President
Science and Regulatory Affairs

Attachment