



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 Barnhouse to serve on the FIFRA SAP. Dr. Barnhouse 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. Barnhouse 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

• Representing the Plant Science Industry •
1156 15th St. N.W. • Washington, D.C. 20005 • 202.296.1585 • 202.463.0474 fax • www.croplifeamerica.org

Botham, Philip
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