



February 1, 2012

Submitted via online federal dockets: EPA-HQ-OPP-2011-0737, EPA-HQ-OPP-2011-0843, and EPA-HQ-OPP-2011-0886

Office of Pesticide Programs (OPP)  
Regulatory Public Docket (7502P)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

**Re: Agency Information Collection Activities; Proposed Renewal of Several Currently Approved Collections; Comment Request. 76 FR 77817. December 14, 2011**

Ladies and Gentlemen:

CropLife America (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 for the crop protection industry.

CLA requests that the comment period for each of the three Information Collection Requests detailed in the subject Federal Register notice be extended by 45 days, from February 13 until March 29, 2012. The applicant's costs of registering a pesticide product, in particular, are ever-increasing, and EPA's estimation approach for preparing and submitting an "Application for New and Amended Pesticide Registration" (Docket # EPA-HQ-OPP-2011-0886) deserves close scrutiny and sufficient time to present the relevant information. A presentation on this topic by EPA personnel to the Pesticide Program Dialogue Committee in October 2011 highlighted significant disparities between the Agency's estimates and actual costs incurred by applicants.

If you have any questions or comments regarding this request, please feel free to contact me ([rmcallister@croplifeamerica.org](mailto:rmcallister@croplifeamerica.org); 202-872-3874).

Sincerely,

A handwritten signature in black ink that reads "Ray S. McAllister". The signature is written in a cursive, flowing style.

Ray S. McAllister  
Senior Director, Regulatory Policy