



February 7, 2012

Submitted via online Federal Dockets: 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.

Dear Sir or Madam:

The American Chemistry Council Biocides Panel (Panel) is composed of about 60 companies that manufacture and formulate antimicrobial pesticides for use in industrial processes, material preservation, marine antifouling, industrial water treatment, public health applications and numerous other uses. The Panel focuses on the broad range of scientific, regulatory, legislative, legal and educational issues unique to antimicrobial pesticides, as well as those issues affecting all pesticide products.

The Panel requests that the comment period for the three Information Collection Request ICR No. 0277.16, OMB Control No. 2070-0060, Docket No EPA-HQ-OPP-2011-0886 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, continue to increase. Further, the Panel previously has provided the Agency with detailed information identifying that the Agency's estimates of costs fall far short of what actually is required. Therefore, the Panel believes that additional time is needed to carefully review EPA's estimation approach for preparing and submitting an "Application for New and Amended Pesticide Registration" (Docket # EPA-HQ-OPP-2011-0886) and to present the relevant information.

If you require additional information, please contact me at 202-249-6724 or mailto:has_shah@americanchemistry.com.

Sincerely,

A handwritten signature in black ink that reads "Hasmukh Shah".

Hasmukh Shah
Manager, Biocides Panel

