



February 10, 2012

Office of Pesticide Programs (OPP)  
Regulatory Public Docket (7502P)  
Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460-0001

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

To Whom It May Concern:

The Chemical Producers and Distributors Association (CPDA) would like to take this opportunity to request a 45-day extension of the public comment period from February 13 to March 29, 2012 for each of the three Information Collection Requests addressed in the above referenced Federal Register Notice.

Of special interest to CPDA, EPA states that it expects a reduction in burden associated with renewal of the existing ICR titled "Application for New and Amended Pesticide Registration." The Agency indicates that the reduction in its burden estimate for this particular ICR renewal reflects fewer expected responses across three main product action types. EPA adds that the reduction in its response estimate is largely due to a reduction in "Type B" activities described as actions that involve a registrant or applicant assembling and submitting an application for the registration of a new or amended product that contains a currently registered active ingredient. EPA explains that "Type B" activities generally involve far less data and complexity than those activities involving an application for registration of a new active ingredient or a new use for a currently registered active ingredient. "Type B" activities may include "me-too" registrations, amendments and notifications. In its Federal Register Notice, EPA further notes, "...due to some industry consolidation and based on registration maintenance fee data, EPA has identified 42 fewer ICR respondents. This change is an adjustment."

CPDA believes that additional time is necessary to thoroughly assess EPA's revised burden estimate and the underlying rationale relied upon by the Agency in developing its revised estimate. The time, resources, and investment incurred by companies in registering a pesticide product are significant. As such, EPA's burden estimate demands careful review and analysis. It is critical that pesticide registrants have a clear understanding of the factors EPA considers in developing its burden estimate related to pesticide registration activities. As such, we hope the Agency will agree to a 45-day extension of the comment period for its December 14, 2011 Federal Register Notice to March 29, 2012.

CPDA respectfully thanks you for your consideration of this request.