



December 14, 2007

Linda Phillips  
Office of Science Coordination and Policy (7203m)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460-0001

Re: Request to extend public comment period for "Draft List of Initial Pesticide Active Ingredients and Pesticide Inerts to be Considered for Screening under the Federal Food, Drug and Cosmetic Act" (72 FR 33486; 6/18/2007; Docket No. EPA-HQ-OPPT-2004-0109)

Dear Ms. Phillips:

CropLife America requests that the comment period for the subject document ("List") be extended once again through February 11, 2008, to coordinate with the 60-day comment period for the "Endocrine Disruptor Screening Program; Draft Policies and Procedures for Initial Screening" ("Policies & Procedures") published on December 13, 2007 (72 FR 70842).

In previous requests for extension of the comment period on draft List, both CropLife America and the American Chemistry Council have emphasized the need for stakeholders to be able to consider the details and requirements of the draft Policies & Procedures in order to provide meaningful and complete comments on the draft List. Publication of the Policies & Procedures was delayed beyond what was expected at the time of release of the draft List. Since the Policies & Procedures document is now finally available, a reasonable comment period can be established for the two documents, to conclude on February 11. The current overlap of the two comment periods of little more than two weeks is not adequate for a thorough evaluation of the List in light of the proposed Policies & Procedures. Furthermore, that overlap period covers the end-of-year holiday period when many personnel who need to be involved will be on leave.

Given the difficulty in contacting those responsible for preparing comments during the approaching holiday/vacation period, it is essential that we have an indication right away of EPA's intentions with respect to the comment periods.

Sincerely,

A handwritten signature in black ink that reads "Ray S. McAllister". The signature is written in a cursive style with a large, stylized initial "R" and "M".

Ray, S. McAllister, Ph.D  
Regulatory Science & Policy Leader