



EPA-HQ-OPP-2020-0263

August 14, 2020

OPP Docket EPA-HQ-OPP-2020-0263
Environmental Protection Agency Docket Center (EPA/DC)
(28221T)

1200 Pennsylvania Ave. NW.
Washington, DC 20460

**Re: Selection of panel members for upcoming EPA Science Advisory Panel
(Docket #: EPA-HQ-OPP-2020-0263)**

CropLife America (CLA) appreciates the opportunity to submit comments to EPA regarding the selection of panel members for EPA Science Advisory Panel meeting September 15-18, 2020.

CLA was established in 1933 and represents the developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. CLA's member companies produce, sell and distribute virtually all the vital crop protection and biotechnology products used by farmers, ranchers and landowners. Crop protection products are necessary to ensure safe, predictable and adequate supplies of food, fiber and fuel. CLA members support science-based regulation of pesticides to ensure that these products are available for these important uses consistent with the laws that protect human health and the environment.

The upcoming Science Advisory panel will look at two issues of great importance to CLA members: Use of New Approach Methodologies to Derive Extrapolation Factors and Evaluate Developmental Neurotoxicity for Human Health Risk Assessment.

CLA fully supports the following nominees due to their extensive experience in testing and evaluating the results of testing for organophosphates, understanding of the PBPK modeling, developmental neurotoxicity and EPA's risk assessment process. Their sketches released in the Federal Register very clearly describe their educational and professional experience that support their nominations.

Dr. Penelope Fenner-Crisp
Dr. Daland Juberg
Dr. Larry Sheets
Dr. Marion Ehrich
Dr. John Lipscomb
Dr. Harvey Clewell

Some have expressed concerns that some of these nominees have experience working with and in industry. However, these people have a unique combination of critically important experience with the data, models and EPA risk assessment methodologies that make them especially qualified to serve on the Panel.

CLA would like to raise reservations about Dr. Olga Naidenko. Dr. Naidenko has published and commented frequently on banning all organophosphates. Please reference the following link:

<https://www.ewg.org/release/ewg-study-epa-fails-follow-landmark-law-protect-children-pesticides-food>. It is hard to imagine how Dr. Naidenko could be an unbiased participant on the panel.

We appreciate your consideration of CLA's comments on panelists.

Sincerely,

A handwritten signature in black ink, appearing to read 'Manojit Basu', with a long horizontal flourish extending to the right.

Manojit Basu, PhD
Director, Science Policy
CropLife America