



October 16, 2023

Susan Bartow  
Chemical Review Manager  
Pesticide Reevaluation Division  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

*Submitted via regulations.gov*

**Re: Docket EPA-HQ-OPP-2023-0420;** Pesticides: Review of Requirements Applicable to Treated Seed and Treated Paint Products; Request for Information and Comments

Dear Ms. Bartow:

CropLife America (CLA) respectfully requests a 60-day extension to the comment period on the Environmental Protection Agency's (EPA or the Agency) Review of Requirements Applicable to Treated Seed and Treated Paint Products.

CLA and other interested stakeholders must have adequate time to gather the requested information on storage, planting, and disposal of treated seed and on whether or to what extent treated seed products are being distributed, sold, and used contrary to treating pesticide and treated seed product labeling instructions. The current comment period does not allow sufficient time to gather the requested information.

Additionally, there are concurrent open dockets on which CLA, our member companies, and other relevant stakeholders will also submit substantive comments, including EPA's Draft Herbicide Strategy, Draft Guidance for New Outdoor Use Registrations, and the Proposed Antimicrobial Resistance Framework.

CLA respectfully requests an extension to the public comment period by 60 days to allow all stakeholders an opportunity to develop and submit comments on these important proposed changes. Should you have any questions or comments, please feel free to contact Katie Stump at [kstump@croplifeamerica.org](mailto:kstump@croplifeamerica.org) or (202) 296-1585.

Sincerely,

A handwritten signature in black ink that reads "Katie Stump". The signature is written in a cursive, flowing style.

Katie Stump  
Manager, Science Policy  
CropLife America

Established in 1933, CLA represents the developers, manufacturers, formulators, and distributors of pesticides and plant science solutions for agriculture and pest management in the United States. CLA's member companies produce, sell, and distribute virtually all the pesticide and biotechnology products used by American farmers.