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Docket: EPA-HQ-OPP-2016-0385
FIFRA Scientific Advisory Panel; Notice of Public Meeting

Comment On: EPA-HQ-OPP-2016-0385-0001
Meetings: Federal Insecticide, Fungicide, and Rodenticide Act Scientific Scientific Advisory Panel

Document: EPA-HQ-OPP-2016-0385-0134
Comment submitted by E. Crouch

Submitter Information

General Comment

From Edmund Crouch

I request that the comment period for this docket be extended, with a strong preference for a 90-day extension. This would also require that the FIFRA panel meeting be delayed for an equivalent period.

1. The amount of material to be reviewed means that the panel members will not have sufficient time by October 20 in any case to review the material adequately, and certainly not to review public comments submitted by October 4 or later.

2. Docket materials for review were only provided initially on September 16, despite the notice of meeting being published in the Federal Register on July 26. 65 of the documents provided in the docket are protected, and the procedure for obtaining them (hopefully now correct after the 2nd change) has only now been placed in the docket (on approximately September 23). After going through this procedure, the public will have less than 10 days before October 4, and less than 30 days prior to the panel meeting, to review documents that the EPA itself has required many months to review. Adequate technical evaluation of these documents would require a minimum of a 90 day comment period.

3. Without adequate time for public and panel member evaluation of these documents, neither EPA nor the public can have confidence in the adequacy and accuracy of the EPA's use of them, part of an adequate peer review process. This is particularly important in this case, in which different authoritative agencies have apparently reached divergent conclusions.

4. There does not appear to be any impediment to an extension to allow adequate public and panel review.