May 1, 2020

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Risk Management and Implementation Branch I
Pesticide Re-evaluation Division

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Re: Request for an Additional Comment Period Extension, Pesticide Registration Review: Proposed Interim Decisions for Several Neonicotinoid Pesticides: ID: EPA-HQ-OPP-2011-0865-1161; ID: EPA-HQ-OPP-2012-0329-0062; ID: EPA-HQ-OPP-2008-0844-1608; ID: EPA-HQ-OPP-2011-0920-0760; ID: EPA-HQ-OPP-2011-0581-0357

Because of delays resulting from COVID-19 complications, the American Association of Pesticide Control Officials (AAPCO) respectfully requests a 45-day extension to the public comment period on the proposed interim decisions (PIDs) for acetamiprid, clothianidin, dinotefuran, imidacloprid, and thiamethoxam.

It is acknowledged that on March 18, 2020 EPA issued an "Authorization to Extend the Public Comment Period for the Neonicotinoids (Clothianidin, Dinotefuran, Imidacloprid, Thiamethoxam, and Acetamiprid) Proposed Interim Decisions". However, on March 11 the World Health Organization made the formal announcement that COVID-19 was characterized as a pandemic. Because of the pandemic, State Lead Agencies (SLA), like many workplaces, had significant shifts in operating processes, staffing levels and priorities. Therefore, SLAs were unable to allocate the needed resources to review the extensive PIDs and provide thoughtful science-based responses.

Thank you for you consideration during this COVID-19 pandemic.

Sincerely,

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