Via email to:

Rick Keigwin, Director, Office of Pesticide Programs
Dana Vogel, Director, Health and Effects Division
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Via certified mail to:

Office of Pesticide Programs (7510P)
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460–0001.

May 7, 2020

Mr. Keigwin and Ms. Vogel,

This letter supplements the attached "Petition to Revoke All Neonic Tolerances," originally submitted by the Natural Resources Defense Council on May 4, 2020, to the following registration review dockets: Imidacloprid (EPA-HQ-OPP-2008-0844), Thiamethoxam (EPA-HQ-OPP-2011-0581), Clothianidin (EPA-HQ-OPP-2011-0865), Acetamiprid (EPA-HQ-OPP-2012-0329), and Dinotefuran (EPA-HQ-OPP-2011-0920). NRDC respectfully requests waiver of all fees associated with its petition.

The Natural Resources Defense Council (NRDC) is a non-profit organization dedicated to safeguarding the earth—its people, its plants and animals, and the natural systems on which all life depends. Much of NRDC's work focuses on protecting people—including its over three million members and online activists nationwide—from exposures to harmful chemicals. Because there is evidence indicating that widespread exposure to neonicotinoid pesticides ("neonics") may be harmful to human health, NRDC has a substantial interest in reducing exposure of its members and the public at large to these harmful pesticides.

NRDC requests a waiver of all fees associated with a petition for revocation of tolerances, 40 C.F.R. § 180.33(f), because NRDC's petition to revoke tolerances for neonics "will promote the public interest," *id.* § 180.33(l). NRDC presents evidence that exposure to neonics during development has adverse effects on the developing nervous system and that neonics are toxic to the mammalian thyroid. Because research indicates that the public is routinely exposed to these harmful substances through food and drinking water, reduction in these exposures will promote the public interest. Moreover, NRDC does not derive any financial benefit from the manufacture or sale of neonics or other pesticides, and otherwise has no financial interest in the modification or elimination of tolerances for neonics on crops.

Because NRDC's petition will promote the public interest, NRDC respectfully requests that EPA waive all fees associated with its petition to eliminate tolerances for neonics. 40 C.F.R. § 180.33(l). Moreover,

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because NRDC derives no financial benefit from the elimination of tolerances for neonics, NRDC requests that the agency not impose fees normally associated with a request for fee waiver. *Id.*

Please contact me at the email or telephone number below with any questions or concerns about NRDC's petition or fee waiver request.

Respectfully submitted,

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