



March 24, 2015

Ms. Susan Lewis
Director, Registration Division
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW.
Washington, DC 20460-0001

Re: **Docket ID No: EPA-HQ-OPP-2014-0355 (*Proposed Registration Decision of the New Active Ingredient Bicyclopyrone*)**

The National Association of State Departments of Agriculture (NASDA) submits the following comments on the U.S. Environmental Protection Agency's (EPA) federal register notice (docket number EPA-HQ-OPP-2014-0355) on the new active ingredient Bicyclopyrone for use as a herbicide on corn.

I. About NASDA

NASDA represents the Commissioners, Secretaries, and Directors of the state departments of agriculture in all fifty states and four U.S. territories. State departments of agriculture are responsible for a wide range of programs including food safety, combating the spread of disease, and fostering the economic vitality of our rural communities. Conservation and environmental protection are also among our chief responsibilities.

In forty-three states, the state department of agriculture is a co-regulator with EPA and responsible for administering, implementing and enforcing the production, labeling, distribution, sale, use and disposal of pesticides under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and other applicable laws and regulations.

II. General Comments

NASDA notes pesticides (including herbicides) are an important component of agriculture/horticultural production systems. Pesticides are utilized in integrated pest management programs and result in the production of abundant and safe food, fiber and ornamental crops which sustain the quality of life we enjoy.

NASDA is intimately familiar with EPA's rigorous, scientific evaluation and approval process for all new active ingredients, including Bicyclopyrone, and we support the development and approval of new crop protection tools, such as Bicyclopyrone, which assist farmers in continuing to produce our nation's food, fiber, and fuel.

Our growers face constant pressures ranging from weather conditions, pest stressors, herbicide resistance issues, and a myriad of other challenges. It is essential to American agriculture that EPA execute its authorities and responsibilities in a timely manner consistent with the Agency's robust science-based registration process to ensure farmers have access to a broad range of new technologies

and modern crop protection tools, such as Bicyclopyrone, to continue to produce our nation's food, fiber, and fuel.

III. Conclusion

NASDA members are well versed in the robust scientific review and approval process EPA undertakes in reviewing and registering pesticides, and we encourage EPA to continue a timely registration and approval of Bicyclopyrone to ensure growers have access to these important crop protection tools.

We appreciate the opportunity to comment on this important issue. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Barbara P. Glenn". The signature is written in a cursive, flowing style.

Barbara P. Glenn, Ph.D.
Chief Executive Officer
NASDA