

February 27, 2017

The Honorable Scott Pruitt
Administrator, US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator Pruitt:

Congratulations on your confirmation as the new administrator for the United States Environmental Protection Agency (US EPA). The American Chemistry Council's (ACC) Biocides Panel (the Panel) looks forward to working with you.

Established in 1986, the Biocides Panel is a leading trade organization comprised of more than 50 companies that are active antimicrobial ingredient producers, end-use manufacturers of antimicrobial products (also known as "biocides") in industrial and/or consumer applications, and service providers with expertise in addressing antimicrobial issues. Antimicrobials are essential to a vast array of industries: They protect public health and food safety by controlling the spread of harmful microbes, preserve a vast array of products from pharmaceuticals to building materials, and ensure countless manufacturing and industrial processes are not compromised by microorganism growth.

In an industry that continuously evolves and innovates, the ability to obtain and maintain antimicrobial registrations is critically important. It is for this reason that we write to stress the important role that the US EPA plays in our industry and the need for continued staff and financial resources within the Office of Pesticide Programs (OPP) and its Antimicrobials Division (AD). Thus, the reauthorization of the Pesticide Registration Improvement Act (PRIA), which would continue the fee for service program and increase funding for OPP for needed resources is a priority, and we ask for your support. Significantly, AD is partly funded through the industry fees collected under PRIA. Thus, the reauthorization of PRIA provides some assurance that the resources required by EPA to administer the pesticide program will continue.

Other issues of importance to the industry, which we would like to discuss with you in greater detail should your schedule permit include:

- Early and frequent engagement with the pesticide registration community on registration decisions, guidance material, and regulation;
- Clear and transparent implementation of EPA's data requirements for the registration of antimicrobial pesticides under 40 CFR Part 158W (Antimicrobial Pesticide Data Requirements); and



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- Assurance that assessments under FIFRA are based on good science and accurate representations of the biocide product's conditions of use.

Thank you for your consideration of the Biocides Panel's concerns. We would appreciate the opportunity to meet with you.

Respectfully yours,



Komal K. Jain
Senior Director, Chemical Products & Technology Division
Executive Manager, Biocides Panel
American Chemistry Council

Cc: Wendy Cleland-Hamnett, Acting Assistant Administrator, OCPP