



May 19, 2017

Kevin Keaney
Field and External Affairs Division (7506P)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

RE: Certification of Pesticide Applicators Rule; Delay of Effective Date; Docket # EPA-HQ-OPP-2011-0183; FRL-9962-94)

Dear Mr. Keaney:

On behalf of the Agricultural Retailers Association (ARA)¹, I am writing in support of the U.S. Environmental Protection Agency's (EPA) decision to delay the effective date of the new Certification and Training regulations to May 22, 2018. Extending the certification timeline will help alleviate some of the challenges facing states that work with EPA on pesticide applicator training programs as well as compliance assistance. In addition, there are several issues within the regulations that we believe need to be modified or repealed. We look forward to working with the agency on this important regulation.

Thank you for your review and consideration of our comments!

Sincerely,

Richard D. Gupton
Senior Vice President, Public Policy & Counsel

¹ ARA represents the nation's agricultural retailers and distributors, also referred to as farm supply dealers. ARA members are located throughout the United States, ranging in size from local-family held businesses and farmer cooperatives to larger companies with multiple outlets. ARA members play an important role in providing farmers with essential crop input products such as fertilizer, plant nutritional, pesticides, seed, adjuvants and equipment.