

October 14, 2004

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Field and External Affairs Division (7506C)
Office of Pesticide Programs
Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460-0001

Subject: Docket ID Number OPP-2004-0205

The Consumer Specialty Products Association (CSPA) would like to request that the comment deadline for "Pesticides; Implementation of Globally Harmonized System; Notice of Availability" (69 FR 52262; 8/25/2004; Docket Number OPP-2004-0305) be extended by 60-90 days in order to give industry and other stakeholders adequate opportunity to review the information and provide the quality analysis that is essential for the EPA to make informed decisions.

A 30-day extension would be not be adequate since it will fall just one week after the proposed GHS Workshop on November 16 and just before the Thanksgiving holiday, and we will need more time to respond to issues arising from the workshop. Opportunity to comment should be done *after* the proposed GHS Workshop because trade associations will need more time for awareness raising and education, and registrants will need more time to understand the GHS. Additionally, we will need more time to make sure there is opportunity to compare and contrast existing U.S. pesticide regulations with those of GHS to explore unintended consequences and potential impacts.

Thank you for considering our request for an extension. I look forward to hearing from you at your earliest convenience.

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