

**Docket No. APHIS-2010-0103**

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Attn: Docket No. APHIS-2010-0103 60-Day Extension Request

January 25, 2012

To Whom It May Concern:

The Organic Trade Association (OTA) requests in the strongest terms a 60-day extension beyond the February 27 deadline for the comment period for APHIS's proposed deregulation and draft environmental assessment on DAS-40278-9, DOW AgroScience LLC's corn engineered to be resistant to the herbicides 2,4-D and quizalofop (2,4-D corn).

OTA is the membership-based business association for organic agriculture and products in North America. OTA is the leading voice for the organic trade in the United States, representing over 6,500 organic businesses across 49 states. Its members include growers, shippers, processors, certifiers, farmers' associations, distributors, importers, exporters, consultants, retailers and others. OTA's Board of Directors is democratically elected by its members. OTA's mission is to promote and protect the growth of organic trade to benefit the environment, farmers, the public and the economy.

A comment period extension is warranted in this case for several reasons. First, 2,4-D corn is the first-ever crop proposed for deregulation that is engineered in response to the widespread emergence of glyphosate-resistant weeds fostered primarily by cultivation of crops engineered for resistance to glyphosate. 2,4-D corn raises new scientific, policy and legal issues. As such, the agency's proposed action demands careful consideration by all stakeholders. Heightened concern about the impact to non-target plants as well as pollinators results in a broadened stakeholder group. APHIS should support and permit an extensive and meaningful public process regarding its unprecedented proposed action.

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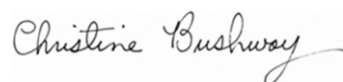
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Secondly, APHIS published the *Federal Register* notice for the Dow 2-4,D corn on Tuesday, Dec. 27, 2011, during the holiday week. This is typically a busy time when many people are observing religious holidays, on vacation, or out of the office. The timing of the *Federal Register* notice effectively limits the public comment period.

Thirdly, supplemental information to the Dow 2,4-D deregulation petition was only posted on [www.regulations.gov](http://www.regulations.gov) on January 12, 2012—further limiting the time available for stakeholder review.

OTA thanks you in advance for your thoughtful consideration of our urgent request to extend the comment period until April 27, 2012.

Thank you for your consideration and do not hesitate to contact me with any questions,



Christine Bushway  
Executive Director and CEO  
Organic Trade Association  
Hall of the States, Washington, D.C.