



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES, AND
TOXIC SUBSTANCES

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Note to File

SUBJECT: Dow AgroSciences' Public Comments Regarding Pioneer Hi-Bred International's Seed Mix Proposal for Corn Rootworm Resistance Management

FROM: Michael Mendelsohn, Senior Regulatory Specialist
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This note clarifies the differences between Dow AgroSciences comments dated November 12, 2008 and January 9, 2009.

On November 14, 2008, Nick Storer of Dow AgroSciences sent a letter to Michael Mendelsohn with a November 12, 2008 attachment commenting on Pioneer Hi-Bred International's seed mix proposal for corn rootworm resistance management. On December 10, 2008, a Federal Register notice announcing the February 23-25, 2009 session of the FIFRA Scientific Advisory Panel (SAP) regarding Scientific Issues Associated with a Seed Mix Proposal for Corn Rootworm Resistance Management, OPP Docket Number EPA-HQ-OPP-2008-0836. Dow AgroSciences subsequently resubmitted Nick Storer's comments via www.regulations.gov to docket EPA-HQ-OPP-2008-0836 with a date of January 9, 2009. The documents are essentially the same except that the 2009 version has an executive summary, additional references, and a section on refuge complexity.